

TSCA NON-CONFIDENTIAL BUSINESS INFORMATION

DOCUMENT DESCRIPTION	DOCUMENT CONTROL NUMBER	DATE RECEIVED
CAIR	90-890000 260	6-27-89

COMMENTS:

DOES NOT CONTAIN CBI

CONTAINS NO CBI

SECTION 1 GENERAL MANUFACTURER, IMPORTER, AND PROCESSOR INFORMATION

PART A GENERAL REPORTING INFORMATION

1.01 This Comprehensive Assessment Information Rule (CAIR) Reporting Form has been completed in response to the Federal Register Notice of..... [1][2] [2][2] [8][9]
CBI mo. day year

☐ a. If a Chemical Abstracts Service Number (CAS No.) is provided in the Federal Register, list the CAS No. [0][2][6][4][7][1]-[6][2]-[5]

b. If a chemical substance CAS No. is not provided in the Federal Register, list either (i) the chemical name, (ii) the mixture name, or (iii) the trade name of the chemical substance as provided in the Federal Register.

(i) Chemical name as listed in the rule Not Applicable

(ii) Name of mixture as listed in the rule Not Applicable

(iii) Trade name as listed in the rule Not Applicable

c. If a chemical category is provided in the Federal Register, report the name of the category as listed in the rule, the chemical substance CAS No. you are reporting on which falls under the listed category, and the chemical name of the substance you are reporting on which falls under the listed category.

Name of category as listed in the rule Not Applicable

CAS No. of chemical substance [][][][][][]-[][]-[]

Name of chemical substance Not Applicable

1.02 Identify your reporting status under CAIR by circling the appropriate response(s).

CBI Manufacturer 1

☐ Importer 2

Processor 3

X/P manufacturer reporting for customer who is a processor 4

X/P processor reporting for customer who is a processor 5

EPA-OTS



000657821T

90-890000260

☐ Mark (X) this box if you attach a continuation sheet.

1.03 Does the substance you are reporting on have an "x/p" designation associated with it in the above-listed Federal Register Notice?

CBI

Yes ☒ Go to question 1.04

☐

No ☐ Go to question 1.05

1.04 a. Do you manufacture, import, or process the listed substance and distribute it under a trade name(s) different than that listed in the Federal Register Notice? Circle the appropriate response.

CBI

Yes 1

☐

No (2)

b. Check the appropriate box below:

☐ You have chosen to notify your customers of their reporting obligations

Provide the trade name(s) Not Applicable

☐ You have chosen to report for your customers

☐ You have submitted the trade name(s) to EPA one day after the effective date of the rule in the Federal Register Notice under which you are reporting.

1.05 If you buy a trade name product and are reporting because you were notified of your reporting requirements by your trade name supplier, provide that trade name.

CBI

Trade name Voronate(R) T-80 Type II Toluene Di-isocyanate

☐

Is the trade name product a mixture? Circle the appropriate response.

Yes 1

No (2)

1.06 Certification -- The person who is responsible for the completion of this form must sign the certification statement below:

CBI

"I hereby certify that, to the best of my knowledge and belief, all information entered on this form is complete and accurate."

Michael Kazio
NAME

Michael Kazio
SIGNATURE

6-22-89
DATE SIGNED

Plant Manager
TITLE

(215) 499-7822
TELEPHONE NO.

☐ Mark (X) this box if you attach a continuation sheet.

- 1.07 Exemptions From Reporting -- If you have provided EPA or another Federal agency with the required information on a CAIR Reporting Form for the listed substance within the past 3 years, and this information is current, accurate, and complete for the time period specified in the rule, then sign the certification below. You are required to complete section 1 of this CAIR form and provide any information now required but not previously submitted. Provide a copy of any previous submissions along with your Section 1 submission.

"I hereby certify that, to the best of my knowledge and belief, all required information which I have not included in this CAIR Reporting Form has been submitted to EPA within the past 3 years and is current, accurate, and complete for the time period specified in the rule."

NOT APPLICABLE		
NAME	SIGNATURE	DATE SIGNED
()		
TITLE	TELEPHONE NO.	DATE OF PREVIOUS SUBMISSION

- 1.08 CBI Certification -- If you have asserted any CBI claims in this report you must certify that the following statements truthfully and accurately apply to all of those confidentiality claims which you have asserted.

CBI
☐ "My company has taken measures to protect the confidentiality of the information, and it will continue to take these measures; the information is not, and has not been, reasonably ascertainable by other persons (other than government bodies) by using legitimate means (other than discovery based on a showing of special need in a judicial or quasi-judicial proceeding) without my company's consent; the information is not publicly available elsewhere; and disclosure of the information would cause substantial harm to my company's competitive position."

NOT APPLICABLE		
NAME	SIGNATURE	DATE SIGNED
()		
TITLE	TELEPHONE NO.	

☐ Mark (X) this box if you attach a continuation sheet.

1.09 Facility Identification

[P][A] [1][9][0][1][3]--[][][][]
State Zip

Other SIC Code [] [] [] []

[P][A] [1][9][0][1][3]--[][][][]
State Zip

Employer ID Number 22. [-] [2] [4] [7] [2] [8] [8] [5]

6

CBI Name [K][N][O][L][L][][I][N][T][E][R][N][A][T][I][O][N][A][L][][][][][][][][][]

[] Address [S][U][I][T][E][][5][9][0][0][][1][5][3][][F][][5][3][][R][D][][S][T][]
Street

[illegible]

[N][Y] [1][0][0][2][2]--[][][][]
State Zip

Dun & Bradstreet Number $[\overline{0}][\overline{4}] - [\overline{8}][\overline{3}][\overline{0}] - [\overline{8}][\overline{0}][\overline{2}][\overline{7}]$

1.12 Technical Contact

CBI Name [E] [D] [W] [I] [N] [] [W] [] [G] [R] [I] [F] [F] [I] [T] [H] [S] [] [] [] [] [] [] [] [] [] []

[] Title [E][N][V][I][R][O][N][M][E][N][T][A][L] [M][A][N][A][G][E][R]

Address [1][5][0][0][_][E][_][S][_][E][_][C][_][O][_][N][_][D][_][S][_][T][_][R][_][E][_][F][_][E][_][T][_][_][_][_][_]
Street

[E][D][D][Y][S][T][O][N][E] [] [] [] [] [] [] [] [] [] [] [] [] [] []
City

P A 1 9 0 1 3 --
State Zip

Telephone Number[2] [1] [5] - [4] [9] [9] - [7] [8] [2] [4]

1.13 This reporting year is from $\begin{bmatrix} 0 \\ 1 \end{bmatrix} \begin{bmatrix} 8 \\ 8 \end{bmatrix}$ to $\begin{bmatrix} 1 \\ 2 \end{bmatrix} \begin{bmatrix} 8 \\ 8 \end{bmatrix}$

☐ Mark (X) this box if you attach a continuation sheet.

Telephone Number[] [] [] - [] [] [] - [] [] [] []

Telephone Number() () () -() () () -() () () ()

8

1.16 For each classification listed below, state the quantity of the listed substance that was manufactured, imported, or processed at your facility during the reporting year.

CBI
☐

<u>Classification</u>	<u>Quantity (kg/yr)</u>
Manufactured	<u>Not Applicable</u>
Imported	<u>Not Applicable</u>
Processed (include quantity repackaged)	<u>3,306,000</u>
Of that quantity manufactured or imported, report that quantity:	
In storage at the beginning of the reporting year	<u>Not Applicable</u>
For on-site use or processing	<u>Not Applicable</u>
For direct commercial distribution (including export)	<u>Not Applicable</u>
In storage at the end of the reporting year	<u>Not Applicable</u>
Of that quantity processed, report that quantity:	
In storage at the beginning of the reporting year	<u>246,500</u>
Processed as a reactant (chemical producer)	<u>3,306,000</u>
Processed as a formulation component (mixture producer)	<u>Not Applicable</u>
Processed as an article component (article producer)	<u>Not Applicable</u>
Repackaged (including export)	<u>Not Applicable</u>
In storage at the end of the reporting year	<u>513,000</u>

☐ Mark (X) this box if you attach a continuation sheet.

1.17 Mixture -- If the listed substance on which you are required to report is a mixture or a component of a mixture, provide the following information for each component chemical. (If the mixture composition is variable, report an average percentage of each component chemical for all formulations.)

[]

Component Name	Supplier Name	Average % Composition by Weight (specify precision, e.g., 45% ± 0.5%)
Not Applicable	Not Applicable	Not Applicable
Total		100%

10

2.04 State the quantity of the listed substance that your facility manufactured, imported, or processed during the 3 corporate fiscal years preceding the reporting year in descending order.

CBI

☐ Year ending [1][2] [8][7]
Mo. Year

Quantity manufactured Not Applicable kg

Quantity imported Not Applicable kg

Quantity processed 3,388,000 kg

Year ending [1][2] [8][6]
Mo. Year

Quantity manufactured Not Applicable kg

Quantity imported Not Applicable kg

Quantity processed 2,966,000 kg

Year ending [1][2] [8][5]
Mo. Year

Quantity manufactured Not Applicable kg

Quantity imported Not Applicable kg

Quantity processed 2,766,000 kg

2.05 Specify the manner in which you manufactured the listed substance. Circle all appropriate process types.

CBI

☐ Continuous process Not Applicable 1

Semicontinuous process Not Applicable 2

Batch process Not Applicable 3

☐ Mark (X) this box if you attach a continuation sheet.

2.06 Specify the manner in which you processed the listed substance. Circle all appropriate process types.

CBI

- ☐ Continuous process 1
- Semicontinuous process 2
- Batch process 3

2.07 State your facility's name-plate capacity for manufacturing or processing the listed substance. (If you are a batch manufacturer or batch processor, do not answer this question.)

CBI

- ☐ Manufacturing capacity Not Applicable kg/yr
- Processing capacity Unknown kg/yr

2.08 If you intend to increase or decrease the quantity of the listed substance manufactured, imported, or processed at any time after your current corporate fiscal year, estimate the increase or decrease based upon the reporting year's production volume.

CBI

<input type="checkbox"/>	Manufacturing Quantity (kg)	Importing Quantity (kg)	Processing Quantity (kg)
Amount of increase			<u>Not Applicable</u>
Amount of decrease			<u>Not Applicable</u>

☐ Mark (X) this box if you attach a continuation sheet.

2.09 For the three largest volume manufacturing or processing process types involving the listed substance, specify the number of days you manufactured or processed the listed substance during the reporting year. Also specify the average number of hours per day each process type was operated. (If only one or two operations are involved, list those.)

CBI

☐

Days/Year Average
Hours/Day

Process Type #1 (The process type involving the largest quantity of the listed substance.)

Manufactured	<u>Not Applicable</u>
Processed	<u>244 days</u> <u>3</u>

Process Type #2 (The process type involving the 2nd largest quantity of the listed substance.)

Manufactured	<u>Not Applicable</u>
Processed	<u>Not Applicable</u>

Process Type #3 (The process type involving the 3rd largest quantity of the listed substance.)

Manufactured	<u>Not Applicable</u>
Processed	<u>Not Applicable</u>

2.10 State the maximum daily inventory and average monthly inventory of the listed substance that was stored on-site during the reporting year in the form of a bulk chemical.

CBI

☐

Maximum daily inventory	<u>Not Applicable</u>	<u> </u> kg
Average monthly inventory	<u>Not Applicable</u>	<u> </u> kg

Not Required for Listed Substance

☐ Mark (X) this box if you attach a continuation sheet.

2.11 Related Product Types -- List any byproducts, coproducts, or impurities present with the listed substance in concentrations greater than 0.1 percent as it is manufactured, imported, or processed. The source of byproducts, coproducts, or impurities means the source from which the byproducts, coproducts, or impurities are made or introduced into the product (e.g., carryover from raw material, reaction product, etc.).

CBI

☐

<u>CAS No.</u>	<u>Chemical Name</u>	<u>Byproduct, Coproduct or Impurity¹</u>	<u>Concentration (%) (specify \pm % precision)</u>	<u>Source of By-products, Coproducts, or Impurities</u>
<u>Not Known</u>	<u>Not Known</u>	<u>Not Known</u>	<u>Not Known</u>	<u>Not Known</u>
<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>

¹Use the following codes to designate byproduct, coproduct, or impurity:

B = Byproduct
C = Coproduct
I = Impurity

☐ Mark (X) this box if you attach a continuation sheet.

- 2.12 Existing Product Types -- List all existing product types which you manufactured, imported, or processed using the listed substance during the reporting year. List the quantity of listed substance you use for each product type as a percentage of the total volume of listed substance used during the reporting year. Also list the quantity of listed substance used captively on-site as a percentage of the value listed under column b., and the types of end-users for each product type. (Refer to the instructions for further explanation and an example.)

CBI

☐

a.	b.	c.	d.
Product Types ¹	% of Quantity Manufactured, Imported, or Processed	% of Quantity Used Captively On-Site	Type of End-Users ²
B	100	100	Not Applicable

¹Use the following codes to designate product types:

A = Solvent	L = Moldable/Castable/Rubber and additives
B = Synthetic reactant	M = Plasticizer
C = Catalyst/Initiator/Accelerator/ Sensitizer	N = Dye/Pigment/Colorant/Ink and additives
D = Inhibitor/Stabilizer/Scavenger/ Antioxidant	O = Photographic/Reprographic chemical and additives
E = Analytical reagent	P = Electrodeposition/Plating chemicals
F = Chelator/Coagulant/Sequestrant	Q = Fuel and fuel additives
G = Cleanser/Detergent/Degreaser	R = Explosive chemicals and additives
H = Lubricant/Friction modifier/Antiwear agent	S = Fragrance/Flavor chemicals
I = Surfactant/Emulsifier	T = Pollution control chemicals
J = Flame retardant	U = Functional fluids and additives
K = Coating/Binder/Adhesive and additives	V = Metal alloy and additives
	W = Rheological modifier
	X = Other (specify) _____

²Use the following codes to designate the type of end-users:

I = Industrial	CS = Consumer
CM = Commercial	H = Other (specify) _____

☐ Mark (X) this box if you attach a continuation sheet.

- 2.13 Expected Product Types -- Identify all product types which you expect to manufacture, import, or process using the listed substance at any time after your current corporate fiscal year. For each use, specify the quantity you expect to manufacture, import, or process for each use as a percentage of the total volume of listed substance used during the reporting year. Also list the quantity of listed substance used captively on-site as a percentage of the value listed under column b., and the types of end-users for each product type. (Refer to the instructions for further explanation and an example.)

CBI

☐

a.	b.	c.	d.
Product Types ¹	% of Quantity Manufactured, Imported, or Processed	% of Quantity Used Captively On-Site	Type of End-Users ²
B	100%	100%	Not Applicable

¹Use the following codes to designate product types:

A = Solvent	L = Moldable/Castable/Rubber and additives
B = Synthetic reactant	M = Plasticizer
C = Catalyst/Initiator/Accelerator/ Sensitizer	N = Dye/Pigment/Colorant/Ink and additives
D = Inhibitor/Stabilizer/Scavenger/ Antioxidant	O = Photographic/Reprographic chemical and additives
E = Analytical reagent	P = Electrodeposition/Plating chemicals
F = Chelator/Coagulant/Sequestrant	Q = Fuel and fuel additives
G = Cleanser/Detergent/Degreaser	R = Explosive chemicals and additives
H = Lubricant/Friction modifier/Antiwear agent	S = Fragrance/Flavor chemicals
I = Surfactant/Emulsifier	T = Pollution control chemicals
J = Flame retardant	U = Functional fluids and additives
K = Coating/Binder/Adhesive and additives	V = Metal alloy and additives
	W = Rheological modifier
	X = Other (specify) _____

²Use the following codes to designate the type of end-users:

I = Industrial	CS = Consumer
CM = Commercial	H = Other (specify) _____

☐ Mark (X) this box if you attach a continuation sheet.

2.14 Final Product -- Complete the following table for each type of final product manufactured, imported, or processed at your facility that contains the listed substance other than as an impurity.

☐

a.	b.	c.	d.
Product Type ¹	Final Product's Physical Form ²	Average % Composition of Listed Substance in Final Product	Type of End-Users ³
Not Applicable	Not Applicable	Not Applicable	Not Applicable
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

¹Use the following codes to designate product types:

A = Solvent	L = Moldable/Castable/Rubber and additives
B = Synthetic reactant	M = Plasticizer
C = Catalyst/Initiator/Accelerator/Sensitizer	N = Dye/Pigment/Colorant/Ink and additives
D = Inhibitor/Stabilizer/Scavenger/Antioxidant	O = Photographic/Reprographic chemical and additives
E = Analytical reagent	P = Electrodeposition/Plating chemicals
F = Chelator/Coagulant/Sequestrant	Q = Fuel and fuel additives
G = Cleanser/Detergent/Degreaser	R = Explosive chemicals and additives
H = Lubricant/Friction modifier/Antiwear agent	S = Fragrance/Flavor chemicals
I = Surfactant/Emulsifier	T = Pollution control chemicals
J = Flame retardant	U = Functional fluids and additives
K = Coating/Binder/Adhesive and additives	V = Metal alloy and additives
	W = Rheological modifier
	X = Other (specify) _____

²Use the following codes to designate the final product's physical form:

A = Gas	F2 = Crystalline solid
B = Liquid	F3 = Granules
C = Aqueous solution	F4 = Other solid
D = Paste	G = Gel
E = Slurry	H = Other (specify) _____
F1 = Powder	

³Use the following codes to designate the type of end-users:

I = Industrial	CS = Consumer
CM = Commercial	H = Other (specify) _____

☐ Mark (X) this box if you attach a continuation sheet.

2.15 Circle all applicable modes of transportation used to deliver bulk shipments of the
CBI listed substance to off-site customers.

☐ Truck Not Applicable 1
Railcar Not Applicable 2
Barge, Vessel Not Applicable 3
Pipeline Not Applicable 4
Plane Not Applicable 5
Other (specify) _____ Not Applicable 6

2.16 Customer Use -- Estimate the quantity of the listed substance used by your customers
CBI or prepared by your customers during the reporting year for use under each category
of end use listed (i-iv).

☐

Category of End Use

i. Industrial Products

Chemical or mixture Not Applicable kg/yr

Article Not Applicable kg/yr

ii. Commercial Products

Chemical or mixture Not Applicable kg/yr

Article Not Applicable kg/yr

iii. Consumer Products

Chemical or mixture Not Applicable kg/yr

Article Not Applicable kg/yr

iv. Other

Distribution (excluding export) Not Applicable kg/yr

Export Not Applicable kg/yr

Quantity of substance consumed as reactant Not Applicable kg/yr

Unknown customer uses Not Applicable kg/yr

☐ Mark (X) this box if you attach a continuation sheet.

SECTION 3 PROCESSOR RAW MATERIAL IDENTIFICATION

PART A GENERAL DATA

3.01 Specify the quantity purchased and the average price paid for the listed substance for each major source of supply listed. Product trades are treated as purchases.
 CBI The average price is the market value of the product that was traded for the listed substance.

☐

<u>Source of Supply</u>	<u>Quantity (kg)</u>	<u>Average Price (\$/kg)</u>
The listed substance was manufactured on-site.	<u>Not Applicable</u>	<u>Not Applicable</u>
The listed substance was transferred from a different company site.	<u>Not Applicable</u>	<u>Not Applicable</u>
The listed substance was purchased directly from a manufacturer or importer.	<u>3,306,000</u>	<u>\$2.11</u>
The listed substance was purchased from a distributor or repackager.	<u>Not Applicable</u>	<u>Not Applicable</u>
The listed substance was purchased from a mixture producer.	<u>Not Applicable</u>	<u>Not Applicable</u>

3.02 Circle all applicable modes of transportation used to deliver the listed substance to your facility.

CBI

☐

- Truck ①
- Railcar ②
- Barge, Vessel 3
- Pipeline 4
- Plane 5
- Other (specify) _____ 6

☐ Mark (X) this box if you attach a continuation sheet.

3.03
CBI

- a. Circle all applicable containers used to transport the listed substance to your facility.

☐

Bags 1
Boxes 2
Free standing tank cylinders 3
Tank rail cars 4
Hopper cars 5
Tank trucks 6
Hopper trucks 7
Drums 8
Pipeline 9
Other (specify) 10

- b. If the listed substance is transported in pressurized tank cylinders, tank rail cars, or tank trucks, state the pressure of the tanks.

Tank cylinders	Not Applicable	mmHg
Tank rail cars	Not Applicable	mmHg
Tank trucks	Not Applicable	mmHg

☐ Mark (X) this box if you attach a continuation sheet.

PART B RAW MATERIAL IN THE FORM OF A MIXTURE

3.04 If you obtain the listed substance in the form of a mixture, list the trade name(s) of the mixture, the name of its supplier(s) or manufacturer(s), an estimate of the average percent composition by weight of the listed substance in the mixture, and the amount of mixture processed during the reporting year.

CBI

☐

<u>Trade Name</u>	<u>Supplier or Manufacturer</u>	<u>Average % Composition by Weight (specify \pm % precision)</u>	<u>Amount Processed (kg/yr)</u>
<u>Not Applicable</u>	<u>Not Applicable</u>	<u>Not Applicable</u>	<u>Not Applicable</u>
<u> </u>	<u> </u>	<u> </u>	<u> </u>
<u> </u>	<u> </u>	<u> </u>	<u> </u>
<u> </u>	<u> </u>	<u> </u>	<u> </u>

☐ Mark (X) this box if you attach a continuation sheet.

PART C RAW MATERIAL VOLUME

3.05 State the quantity of the listed substance used as a raw material during the reporting year in the form of a class I chemical, class II chemical, or polymer, and the percent composition, by weight, of the listed substance.

☐

	Quantity Used (kg/yr)	% Composition by Weight of Listed Sub- stance in Raw Material (specify \pm % precision)
Class I chemical	3.306 MM	100%
Class II chemical		
Polymer		

☐ Mark (X) this box if you attach a continuation sheet.

SECTION 4 PHYSICAL/CHEMICAL PROPERTIES

General Instructions:

If you are reporting on a mixture as defined in the glossary, reply to questions in Section 4 that are inappropriate to mixtures by stating "NA -- mixture."

For questions 4.06-4.15, if you possess any hazard warning statement, label, MSDS, or other notice that addresses the information requested, you may submit a copy or reasonable facsimile in lieu of answering those questions which it addresses.

PART A PHYSICAL/CHEMICAL DATA SUMMARY

- 4.01 Specify the percent purity for the three major¹ technical grade(s) of the listed substance as it is manufactured, imported, or processed. Measure the purity of the substance in the final product form for manufacturing activities, at the time you import the substance, or at the point you begin to process the substance.

CBI

☐

	<u>Manufacture</u>	<u>Import</u>	<u>Process</u>
Technical grade #1	_____ % purity	_____ % purity	99.5 % purity
Technical grade #2	_____ % purity	_____ % purity	_____ % purity
Technical grade #3	_____ % purity	_____ % purity	_____ % purity

¹Major = Greatest quantity of listed substance manufactured, imported or processed.

- 4.02 Submit your most recently updated Material Safety Data Sheet (MSDS) for the listed substance, and for every formulation containing the listed substance. If you possess an MSDS that you developed and an MSDS developed by a different source, submit your version. Indicate whether at least one MSDS has been submitted by circling the appropriate response.

Yes 1

No 2

Indicate whether the MSDS was developed by your company or by a different source.

Your company 1

Another source 2



Mark (X) this box if you attach a continuation sheet.

M A T E R I A L S A F E T Y D A T A S H E E T

Dow Chemical U.S.A.* Midland, MI 48674 Emergency Phone: 517-636-4400

Product Code: 92098 Page: 1
PRODUCT NAME: VORANATE (R) T-80 TYPE II TOLUENE DIISOCYANATE

Effective Date: 12/13/88 Date Printed: 05/03/89 MSD: 000609

1. INGREDIENTS: (% w/w, unless otherwise noted)

Toluene-2,4-diisocyanate (TDI)	CAS# 000584-84-9	80%
Toluene-2,6-diisocyanate	CAS# 000091-08-7	20%

This document is prepared pursuant to the OSHA Hazard Communication Standard (29 CFR 1910.1200). In addition, other substances not 'Hazardous' per this OSHA Standard may be listed. Where proprietary ingredient shows, the identity may be made available as provided in this standard.

2. PHYSICAL DATA:

BOILING POINT: 250C (482F)
VAP PRESS: 0.01 mmHg @ 20C
VAP DENSITY: 6.0
SOL. IN WATER: Insoluble
SP. GRAVITY: 1.22 @ 25/15.5C
APPEARANCE: Water white to pale yellow liquid.
ODOR: Sharp pungent odor.

3. FIRE AND EXPLOSION HAZARD DATA:

FLASH POINT: 127C (260F)
METHOD USED: PMCC, ASTM D-93

FLAMMABLE LIMITS

LFL: Not determined
UFL: Not determined

EXTINGUISHING MEDIA: Carbon dioxide, dry chemical, or foam.
If water is used, it should be in very large quantity.
The reaction between water and hot isocyanate may be vigorous.

FIRE & EXPLOSION HAZARDS: Down-wind personnel must be evacuated.
Do not reseal contaminated containers since pressure build-up may cause rupture. Fire point: 146C (295F).

FIRE-FIGHTING EQUIPMENT: People who are fighting isocyanate fires must be protected against nitrogen oxide fumes and isocyanate vapors by wearing positive pressure self-contained breathing

(Continued on Page 2)

(R) Indicates a Trademark of The Dow Chemical Company

* An Operating Unit Of The Dow Chemical Company

M A T E R I A L S A F E T Y D A T A S H E E T

Dow Chemical U.S.A.* Midland, MI 48674 Emergency Phone: 517-636-4400

Product Code: 92098 Page: 2
PRODUCT NAME: VORANATE (R) T-80 TYPE II TOLUENE DIISOCYANATE

Effective Date: 12/13/88 Date Printed: 05/03/89 MSD: 000609

3. FIRE AND EXPLOSION HAZARD DATA: (CONTINUED)

apparatus and full protective clothing.

4. REACTIVITY DATA:

STABILITY: (CONDITIONS TO AVOID). Stable when stored under recommended storage conditions. Store in a dry place at temperatures between 18-41C (65-105F).

INCOMPATIBILITY: (SPECIFIC MATERIALS TO AVOID) Water, acid, base, alcohols, metal compounds, surface active materials. Avoid water as it reacts to form heat, CO₂ and insoluble urea. The combined effect of the CO₂ and heat can produce enough pressure to rupture a closed container.

HAZARDOUS DECOMPOSITION PRODUCTS: Isocyanate vapor and mist, carbon dioxide, carbon monoxide, nitrogen oxides and traces of hydrogen cyanide.

HAZARDOUS POLYMERIZATION: May occur with incompatible reactants, especially strong bases, water or temperatures over 41C (105F).

5. ENVIRONMENTAL AND DISPOSAL INFORMATION:

ACTION TO TAKE FOR SPILLS/LEAKS:

Evacuate and ventilate spill area, dike spill to prevent entry into water system, wear full protective equipment including respiratory equipment during clean up.

Major spill: Call Dow Chemical U.S.A. (409) 238-2112. If transportation spill involved call CHEMTREC (800) 424-9300. If temporary control of isocyanate vapor is required a blanket of protein foam (available at most fire departments) may be placed over the spill. Large quantities may be pumped into closed but not sealed containers for disposal.

Minor spill: Absorb the isocyanate with sawdust or other absorbent and shovel into open top containers. Do not make pressure tight. Transport to a well-ventilated area (outside) and treat with neutralizing solution consisting of a mixture of

(Continued on Page 3)

(R) Indicates a Trademark of The Dow Chemical Company

* An Operating Unit Of The Dow Chemical Company

25a

M A T E R I A L S A F E T Y D A T A S H E E T

Dow Chemical U.S.A.* Midland, MI 48674 Emergency Phone: 517-636-4400

Product Code: 92098 Page: 3
PRODUCT NAME: VORANATE (R) T-80 TYPE II TOLUENE DIISOCYANATE

Effective Date: 12/13/88 Date Printed: 05/03/89 MSD: 000609

5. ENVIRONMENTAL AND DISPOSAL INFORMATION: (CONTINUED)

water and 3-8% concentrated ammonium hydroxide or 5-10% sodium carbonate. Add about 10 parts of neutralizer per part of isocyanate with mixing. Allow to stand for 48 hours letting evolved carbon dioxide to escape.

Clean-up: Decontaminate floor using water/ammonia solution with 1-2% added detergent letting stand over affected area for at least 10 minutes. Cover mops and brooms used for this with plastic and dispose properly (often by incineration).

DISPOSAL METHOD: Follow all federal, state and local regulations. Liquids are usually incinerated in a proper facility. Solids are usually also incinerated or landfilled. Empty drums should be filled with water. Let drum stand unsealed for 48 hours. Before disposal drums should be drained, triple rinsed, and holed to prevent reuse. Dispose of drain and rinse fluid according to federal, state and local laws and regulations. The most commonly accepted method is in an approved wastewater treatment facility. Drums should be disposed of in accordance with federal, state and local laws and regulations. Commonly accepted methods for disposal of plastic drums are disposal in an approved landfill after shredding or incineration in an approved industrial incinerator or other appropriate incinerator facility. Steel drums are commonly disposed in an approved landfill after crushing or in accordance with other approved procedures.

6. HEALTH HAZARD DATA:

EYE: May cause pain, severe eye irritation and moderate corneal injury. Vapors may irritate eyes.

SKIN CONTACT: Prolonged or repeated exposure may cause severe irritation, even a burn. Skin contact may result in allergic reaction even though it is not expected to result in absorption of amounts sufficient to cause other adverse effects.

SKIN ABSORPTION: The LD50 for skin absorption in rabbits is >9400 mg/kg.

(Continued on Page 4)

(R) Indicates a Trademark of The Dow Chemical Company

* An Operating Unit Of The Dow Chemical Company

M A T E R I A L S A F E T Y D A T A S H E E T

Dow Chemical U.S.A.* Midland, MI 48674 Emergency Phone: 517-636-4400

Product Code: 92098

Page: 4

PRODUCT NAME: VORANATE (R) T-80 TYPE II TOLUENE DIISOCYANATE

Effective Date: 12/13/88 Date Printed: 05/03/89

MSD: 000609

6. HEALTH HAZARD DATA: (CONTINUED)

INGESTION: Single dose oral toxicity is low. The oral LD50 for rats is 5800 mg/kg. Ingestion may cause gastrointestinal irritation or ulceration.

INHALATION: Excessive vapor concentrations are attainable and could be hazardous on single exposure. Single and repeated excessive exposure may cause severe irritation to upper respiratory tract and lungs (choking sensation, chest tightness), respiratory sensitization, decreased ventilatory capacity, liver effects, cholinesterase depression, gastrointestinal distress and/or neurologic disorders. The 4-hour LC50 for TDI for rats is 13.9 ppm.

SYSTEMIC & OTHER EFFECTS: Based on available data, repeated exposures are not anticipated to cause any additional significant adverse effects. For hazard communication purposes under OSHA standard 29 CFR Part 1910.1200, this chemical is listed as a potential carcinogen by Nat'l. Tox. Program and IARC. An oral study in which high doses of TDI were reported to cause cancer in animals has been found to contain numerous deficiencies which compromise the validity of the study. TDI did not cause cancer in laboratory animals exposed by inhalation, the most likely route of exposure. Birth defects are unlikely. Exposures having no effect on the mother should have no effect on the fetus. Did not cause birth defects in animals; other effects were seen in the fetus only at doses which caused toxic effects to the mother. Results of in vitro ("test tube") mutagenicity tests have been inconclusive.

7. FIRST AID:

EYES: Irrigate with flowing water immediately and continuously for 15 minutes. Consult medical personnel.

SKIN: In case of contact, immediately flush skin with plenty of water for at least 15 minutes while removing contaminated clothing and shoes. Call a physician if irritation persists. Wash clothing before reuse. Destroy contaminated shoes.

INGESTION: Do not induce vomiting. Call a physician and/or

(Continued on Page 5)

(R) Indicates a Trademark of The Dow Chemical Company

* An Operating Unit Of The Dow Chemical Company

M A T E R I A L S A F E T Y D A T A S H E E T

Dow Chemical U.S.A.* Midland, MI 48674 Emergency Phone: 517-636-4400

Product Code: 92098 Page: 5
PRODUCT NAME: VORANATE (R) T-80 TYPE II TOLUENE DIISOCYANATE

Effective Date: 12/13/88 Date Printed: 05/03/89 MSD: 000609

7. FIRST AID: (CONTINUED)

transport to emergency facility immediately.

INHALATION: Remove to fresh air. If not breathing, give mouth-to-mouth resuscitation. If breathing is difficult, give oxygen. Call a physician.

NOTE TO PHYSICIAN: May cause tissue destruction leading to stricture. If lavage is performed, suggest endotracheal and/or esophagoscopy control. If burn is present, treat as any thermal burn, after decontamination. No specific antidote. Supportive care. Treatment based on judgment of the physician in response to reactions of the patient. The manifestations of the respiratory symptoms, including pulmonary edema, resulting from acute exposure may be delayed. May cause respiratory sensitization. Cholinesterase inhibition has been noted in human exposure but is not of benefit in determining exposure and is not correlated with signs of exposure.

8. HANDLING PRECAUTIONS:

EXPOSURE GUIDELINE(S): OSHA PEL is 0.02 ppm as a ceiling limit for toluene 2,4-diisocyanate. ACGIH TLV is 0.005 ppm; 0.02 ppm STEL for toluene 2,4-diisocyanate. Dow Industrial Hygiene Guide is 0.02 ppm as a ceiling limit for toluene diisocyanate.

VENTILATION: Provide general and/or local exhaust ventilation to control airborne levels below the exposure guidelines.

RESPIRATORY PROTECTION: Atmospheric levels should be maintained below the exposure guideline. When respiratory protection is required for certain operations, use an approved supplied-air respirator. For emergency and other conditions where the exposure guideline may be greatly exceeded, use an approved positive-pressure self-contained breathing apparatus.

SKIN PROTECTION: Use protective clothing impervious to this material. Selection of specific items such as gloves, boots, apron, or full-body suit will depend on operation. Remove contaminated clothing immediately, wash skin area with soap and water, and launder clothing before reuse. Safety shower should

(Continued on Page 6)

(R) Indicates a Trademark of The Dow Chemical Company

* An Operating Unit Of The Dow Chemical Company

258

M A T E R I A L S A F E T Y D A T A S H E E T

Dow Chemical U.S.A.* Midland, MI 48674 Emergency Phone: 517-636-4400

Product Code: 92098 Page: 6
PRODUCT NAME: VORANATE (R) T-80 TYPE II TOLUENE DIISOCYANATE

Effective Date: 12/13/88 Date Printed: 05/03/89 MSD: 000609

8. HANDLING PRECAUTIONS: (CONTINUED)

be located in immediate work area.

EYE PROTECTION: Use chemical goggles. If vapor exposure causes eye irritation, use a full-face, supplied-air respirator. Eye wash fountain should be located in immediate work area.

9. ADDITIONAL INFORMATION:

REGULATORY REQUIREMENTS:

SARA HAZARD CATEGORY: This product has been reviewed according to the EPA 'Hazard Categories' promulgated under Sections 311 and 312 of the Superfund Amendment and Reauthorization Act of 1986 (SARA Title III) and is considered, under applicable definitions, to meet the following categories:

An immediate health hazard
A delayed health hazard
A reactive hazard

SPECIAL PRECAUTIONS TO BE TAKEN IN HANDLING AND STORAGE: Warning properties of this material (irritation of eyes, nose and throat) not adequate to prevent chronic overexposure from inhalation. This material can produce asthmatic sensitization upon either single inhalation exposure to a relatively high concentration or upon repeated inhalation exposure to lower concentrations. Exposures to vapors of heated TDI can be extremely dangerous. (Have TDI neutralizer available for spills.)

MSDS STATUS: Revised Section 9

SARA 313 INFORMATION:

This product contains the following substances subject to the reporting requirements of section 313 of Title III of the Superfund Amendments and Reauthorization Act of 1986 and 40 CFR Part 372:

(Continued on Page 7)

(R) Indicates a Trademark of The Dow Chemical Company

* An Operating Unit Of The Dow Chemical Company

25g

M A T E R I A L S A F E T Y D A T A S H E E T

Dow Chemical U.S.A.* Midland, MI 48674 Emergency Phone: 517-636-4400

Product Code: 92098 Page: 7
PRODUCT NAME: VORANATE (R) T-80 TYPE II TOLUENE DIISOCYANATE

Effective Date: 12/13/88 Date Printed: 05/03/89 MSD: 000609

9. ADDITIONAL INFORMATION: (CONTINUED)

CHEMICAL NAME	CAS NUMBER	CONCENTRATION	

TOLUENE-2,6-DIISOCYANATE	000091-08-7	20	%
TOLUENE-2,4-DIISOCYANATE	000584-84-9	80	%

(R) Indicates a Trademark of The Dow Chemical Company
The Information Herein Is Given In Good Faith, But No Warranty,
Express Or Implied, Is Made. Consult The Dow Chemical Company
For Further Information.

* An Operating Unit Of The Dow Chemical Company



OCEAN® Network
EMERGENCY PHONE 1-800-OLIN-911

MATERIAL SAFETY DATA

256

SECTION I - IDENTIFICATION

MSDS FILE 563

CHEMICAL NAME & SYNONYMS Toluene Diisocyanate 80-20		
CHEMICAL FAMILY Isocyanate	FORMULA $C_9H_6N_2O_2$	PRODUCT TDI 80-20
DESCRIPTION Clear colorless to pale yellow liquid with sharp pungent odor		CAS NO. 26471-62-5

SECTION II - NORMAL HANDLING PROCEDURES

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORAGE Harmful if swallowed. Avoid contact with eyes, skin or clothing. Upon contact with skin or eyes, wash off with water. Avoid breathing mist or vapor. Protect against physical damage. Store in a cool, dry, well-ventilated place, away from areas where a fire hazard may be acute. Outside or detached storage is preferred. Blanket storage tanks with inert gas (nitrogen) or dry air. Separate from oxidizing materials.	
PROTECTIVE EQUIPMENT	VENTILATION REQUIREMENTS
EYES Goggles	As required to keep airborne concentrations below TLV
GLOVES Rubber, NBR or PVA	
OTHER Coveralls, impervious footwear	

SECTION III - HAZARDOUS INGREDIENTS

BASIC MATERIAL	OSHA PEL	LD50	LC50	SIGNIFICANT EFFECTS
*Toluene-2,4-diisocyanate (80%) CAS No.: 584-84-9	0.02 ppm ceiling	5.8 g/kg (rat)	10 ppm/4 hrs (mouse)	Skin, eye, mucous membrane irritation. Pulmonary irritant. Allergic sensitization to skin and respiratory tract. May cause asthma attacks.
*Toluene-2,6-diisocyanate(20%),CAS No.:91-08-7	None established	No data	11 ppm/4 hrs-mouse	Irritation

SECTION IV - FIRE AND EXPLOSION HAZARD DATA

FLASH POINT 270°F CDC METHOD	OSHA CLASSIFICATION Not Regulated (Ignitable)	FLAMMABLE EXPLOSIVE LIMIT	LOWER 0.9%	UPPER 9.5%
EXTINGUISHING MEDIA Water, carbon dioxide or dry chemical. Use water to keep the exposed containers cool.				
SPECIAL FIRE HAZARD & FIRE FIGHTING PROCEDURES Use NIOSH/MSHA approved positive pressure self-contained breathing apparatus when any material is involved in a fire.				

SECTION V - HEALTH HAZARD DATA

THRESHOLD LIMIT VALUE 0.005 ppm TWA, 0.02 ppm STEL - 2,4 TDI (ACGIH 1987-88)
SYMPTOMS OF OVER EXPOSURE May cause irritation to eyes, throat, lungs, stomach, skin. Allergic sensitization to skin and respiratory tract. May cause asthma attacks
EMERGENCY FIRST-AID PROCEDURES
SKIN Immediately flush thoroughly with water for 15 minutes, call a physician.
EYES Immediately flush thoroughly with water for 15 minutes, call a physician.
INGESTION Immediately drink large quantities of water to dilute.
INHALATION Immediately remove victim to fresh air. Call a physician.

SECTION VI - TOXICOLOGY (PRODUCT)

ACUTE ORAL LD 50 5.8 g/kg (rats). Harmful if swallowed.
ACUTE DERMAL LD 50
> 2 g/kg (rabbits)
ACUTE INHALATION LC 50
10 ppm/4 hrs (mouse)

CARCINOGENICITY Oral Exposure-Positive NTP Bioassay
MUTAGENICITY Not known to be mutagenic
EYE IRRITATION Irritation and/or burns
PRIMARY SKIN IRRITATION
Irritation and/or burns

PRINCIPAL ROUTES OF ABSORPTION

Inhalation, dermal contact

EFFECTS OF ACUTE EXPOSURE May cause irritation to lungs, eyes, throat, stomach, skin. Allergic sensitization of skin and respiratory tract. Corneal injury may occur.

EFFECTS OF CHRONIC EXPOSURE Damage/allergic sensitization to lungs. Inhalation studies indicate not carcinogenic. Carcinogenic risk from industrial use is not significant.

SECTION VII - SPILL AND LEAKAGE PROCEDURES (CONTROL PROCEDURES)

ACTION FOR MATERIAL RELEASE OR SPILL

Wear NIOSH/MSHA approved positive pressure supplied air respirator. Follow OSHA regulations for respirator use (see 29 CFR 1910.134). Wear goggles, coveralls and impervious gloves and boots. Add dry non-combustible absorbent, sweep up material and place in an approved DOT container. Add an equal amount of neutralizing solution to the container (90-95% water, 5-10% ammonia). Clean remaining surfaces with neutralizing solution and add this to container. Isolate container in a well-ventilated place and do not seal for 24 hrs. Ammonia vapors may be generated until solution is neutralized. Wash all contaminated clothing before reuse. In the event of a large spill use the telephone number shown on the front of this sheet.

TRANSPORTATION EMERGENCY, CONTACT CHEMTREC 800-424-9300

THE MIXTURE OR TRADE NAME PRODUCT HEREIN CONTAINS A TOXIC CHEMICAL(S) SUBJECT TO THE REPORTING REQUIREMENTS OF SECTION 313 OF TITLE III OF THE SUPERFUND AMENDMENTS AND REAUTHORIZATION ACT OF 1986 AND 40 CFR PART 372. THE SARA 313 CHEMICALS ARE LISTED IN SECTION III AND ARE INDICATED BY AN ASTERISK (*).

SECTION VIII - SHIPPING DATA

D.O.T. Toluene diisocyanate Poison B UN 2078

SECTION IX - REACTIVITY DATA

STABLE <input checked="" type="checkbox"/>	UNSTABLE <input type="checkbox"/>	AT <input type="checkbox"/> C <input type="checkbox"/> F <input type="checkbox"/>	HAZARDOUS POLYMERIZATION	MAY OCCUR <input checked="" type="checkbox"/> WILL NOT OCCUR <input type="checkbox"/>
CONDITIONS TO AVOID Water or incompatible materials in a closed system, excess heat				
INCOMPATIBILITY(MATERIAL TO AVOID) Acids, bases and alcohols, surface active materials				
HAZARDOUS DECOMPOSITION PRODUCTS Carbon monoxide, nitrogen oxides, hydrogen cyanide				

SECTION X - PHYSICAL DATA

MELTING POINT 53-56°F	VAPOR PRESSURE .01mmHg, 20°C	VOLATILES No data
BOILING POINT 484°F	SOLUBILITY IN WATER Insoluble	EVAPORATION RATE No data
SPECIFIC GRAVITY(H2O=1) 1.22	PH No data	VAPOR DENSITY(AIR=1) 6.0

INFORMATION: FURNISHED TO

81353002

FURNISHED BY

DATE

APRIL 13, 1989

ATTN: DEPT HANDLING MATL SAFETY DATA SHEETS
SCOTFOAM CORP
1500 E 2ND STREET
EDDYSTONE PA 19013

Department of Environmental Hygiene and Toxicology
(203) 789-5436

Olin CORPORATION

120 Long Ridge Road, Stamford, Connecticut 06904

OCEAN® Network

EMERGENCY PHONE 1-800-OLIN-911

MATERIAL SAFETY DATA SHEET

BASF Corporation Chemicals Division
100 Cherry Hill Road, Parsippany, New Jersey 07054, (201) 316-3000
HMIS: H4 F1 R1

25
BASF

PRODUCT NUMBER: 585621 LUPRANATE® T80-Type 1

SECTION I

*Registered Trademark

TRADE NAME: LUPRANATE® T80-Type 1

CHEMICAL NAME: Toluene Diisocyanate

SYNONYMS: TDI; Tolylene Diisocyanate

FORMULA: $\text{CH}_3\text{C}_6\text{H}_4(\text{NCO})_2$

CHEMICAL FAMILY: Aromatic Isocyanates

MOL. WGT.: 174.16

SECTION II - INGREDIENTS

COMPONENT	CAS NO.	%	PEL/TLV - SOURCE
LUPRANATE® T80-Type 1 Contains:		100	Not established
2,4 Toluene Diisocyanate	584-84-9	80	0.005 ppm, ACGIH 0.02 ppm STEL, ACGIH 0.02 ppm Ceiling, OSHA
2,6 Toluene Diisocyanate	91-08-7	20	
SARA Title III Sect. 313: Listed. All components are in TSCA inventory.			

SECTION III - PHYSICAL DATA

BOILING/MELTING POINT @760 mm Hg: 484°F/ N/A	pH: N/A
VAPOR PRESSURE mm Hg @20 C: 0.025	Vapor Density (Air=1): 6.0
SPECIFIC GRAVITY OR BULK DENSITY: 1.22	Freezing Point: 51.8-53.6°F
SOLUBILITY IN WATER: Water reacts	
APPEARANCE: Colorless liquid	ODOR: Pungent
	INTENSITY: Strong

SECTION IV - FIRE AND EXPLOSION HAZARD DATA

FLASH POINT (TEST METHOD): 270°F TAG Open Cup	AUTOIGNITION TEMP: >620°F
FLAMMABILITY LIMITS IN AIR (% BY VOL)	LOWER: 0.9% UPPER: 9.5%
EXTINGUISHING MEDIUM	Use water fog, foam or CO2 extinguishing media.
SPECIAL FIREFIGHTING PROCEDURES	Personnel engaged in fighting isocyanate fires must be protected against nitrogen dioxide fumes as well as isocyanate vapors. Firefighters must wear self-contained
UNUSUAL FIRE AND EXPLOSION HAZARDS	breathing apparatus and turnout gear. Avoid water contamination in closed containers or confined areas; carbon dioxide gas is generated.

EMERGENCY TELEPHONE NUMBER

CHEMTREC 800-424-9300

201-316-3000

THIS NUMBER IS AVAILABLE DAYS, NIGHTS, WEEKENDS, AND HOLIDAYS

SECTION V - HEALTH DATA**TOXICOLOGICAL TEST DATA:**

LUPRANATE* T80-Type 1

2,4 Toluene Diisocyanate

Rat, Oral LD50

Mouse, Inhalation LC50

RESULT:

Severe eye and skin
irritant, sensitizer
5.8 g/kg.
10 ppm/4H

EFFECTS OF OVEREXPOSURE:

The primary routes of exposure to this material are eye or skin contact, and inhalation. Inhalation of the vapors causes severe irritation to lungs, and pulmonary edema can occur after a serious vapor exposure. Liquid contact causes serious skin and eye burns. Pulmonary sensitization can occur in some individuals leading to asthma-type spasms of the bronchial tubes and difficulty in breathing. Preclude from exposure those individuals having a history of respiratory illness, asthmatic conditions, eye damage or TDI sensitization. Recent studies indicate that overexposure may be associated with chronic lung impairment. In a National Toxicology Program (NTP) study, TDI was carcinogenic when given orally to rats and mice at maximum tolerated doses. TDI was not carcinogenic to rats in a two-year inhalation study. Based on the results of the oral study, TDI was included in the NTP Annual Report on Carcinogens.

FIRST AID PROCEDURES:

Existing medical conditions aggravated by exposure to this material:
Pulmonary disorders.

Eyes-Immediately wash eyes with running water for 15 minutes.
Get immediate medical attention.

Skin-Wash affected areas with water while removing contaminated clothing. Get immediate medical attention. Launder contaminated clothing before reuse.

Ingestion-If swallowed, DO NOT INDUCE VOMITING. Dilute with water or milk and get immediate medical attention. Never give fluids or induce vomiting if the victim is unconscious or having convulsions.

Inhalation-Move to fresh air. Aid in breathing, if necessary, and get immediate medical attention.

SECTION VI - REACTIVITY DATA**STABILITY:**

Stable.

CONDITIONS TO AVOID:

Avoid temperatures >40°C for extended periods of time.

CHEMICAL INCOMPATIBILITY:

Water, basic compounds, alcohols, acids, amines.

HAZARDOUS DECOMPOSITION PRODUCTS:

TDI vapors, NOx, CO and HCN.

HAZARDOUS POLYMERIZATION:

May occur.

Avoid contamination with moisture

CONDITIONS TO AVOID:

and other products that react with isocyanates.

CORROSIVE TO METAL:

No

OXIDIZER:

No

SECTION VII - SPECIAL PROTECTION**RESPIRATORY PROTECTION:**

NIOSH/MSHA approved respiratory equipment for transfer operations or escape. Self-contained breathing apparatus if the P.E.L. is exceeded, or in confined areas or if a leak occurs.

EYE PROTECTION:

Wear fitted goggles or face shield and safety glasses.

PROTECTIVE CLOTHING:

Rubber gloves, coveralls, boots and rubber apron which must be cleaned after each use. Hardhat for head protection.

VENTILATION:

Use local exhaust wherever vapors are generated.

OTHER:

Maintain work area below P.E.L. Vented vapors should be scrubbed through carbon filters or other similarly effective medias.

PRODUCT NUMBER: 585621 LUPRANATE* T80-Type 1

SECTION VIII - ENVIRONMENTAL DATA

ENVIRONMENTAL TOXICITY DATA:

Aquatic toxicity rating: TLM 96: 10 ppm - 1 ppm.

SPILL AND LEAK PROCEDURES:

LUPRANATE* T80 is a RCRA-regulated product. Wear protective clothing, evacuate all not involved in the cleanup. For minor spills, absorb with absorbent and containerize into open top drums. Decontaminate spill area with a mixture of 90% water, 8% concentrated ammonia and 2% detergent.

HAZARDOUS SUBSTANCE SUPERFUND: Yes RQ (lbs): 100

WASTE DISPOSAL METHOD:

Dispose of waste in a RCRA-permitted facility.
Incinerate or landfill in a RCRA-permitted facility.

HAZARDOUS WASTE 40CFR261: Yes

HAZARDOUS WASTE NUMBER: U 223

CONTAINER DISPOSAL:

Containers should be neutralized with liquid decontaminant. Empty containers, containing less than 1" of residue, may be landfilled. If containers are not empty, they must be disposed as a hazardous waste in a RCRA-licensed facility.

SECTION IX - SHIPPING DATA

D.O.T. PROPER SHIPPING NAME (49CFR172.101-102)

Toluene Diisocyanate

HAZARDOUS SUBSTANCE
(49CFR CERCLA LIST)

Yes

REPORTABLE QUANTITY (RQ) 100 lb

D.O.T. HAZARD CLASSIFICATION (CFR172.101-102)

PRIMARY

Poison B

SECONDARY

D.O.T. LABELS REQUIRED (49CFR172.101-102)

Poison

D.O.T. PLACARDS
REQUIRED (CFR172.504)

BULK ONLY
Poison-2078

POISON CONSTITUENT
(49CFR172.203(K))
TDI

BILL OF LADING DESCRIPTION

Toluene Diisocyanate-Poison B-UN 2078 RQ 100 lbs.
*** Placarded: POISON ***

CC NO. 190

UN/NA CODE 2078

DATE PREPARED: 4 / 17 / 88

UPDATED: 5 / 16 / 88

WHILE BASF CORPORATION BELIEVES THE DATA SET FORTH HEREIN ARE ACCURATE AS OF THE DATE HEREOF, BASF CORPORATION MAKES NO WARRANTY WITH RESPECT THERETO AND EXPRESSLY DISCLAIMS ALL LIABILITY FOR RELIANCE THEREON. SUCH DATA ARE OFFERED SOLELY FOR YOUR CONSIDERATION, INVESTIGATION, AND VERIFICATION.

SECTION X - PRODUCT LABEL**LUPRANATE* T80-Type 1****DANGER: POISON**

HARMFUL IF INHALED.

CONTACT WITH EYES AND SKIN RESULTS IN SERIOUS BURNS. INHALATION OF VAPORS CAUSES SEVERE IRRITATION TO LUNGS. PULMONARY EDEMA MAY OCCUR. PULMONARY SENSITIZATION CAN OCCUR IN SOME INDIVIDUALS, LEADING TO ASTHMA-TYPE SPASMS OF THE BRONCHIAL TUBES AND DIFFICULTY IN BREATHING. INDIVIDUALS WITH A HISTORY OF RESPIRATORY ILLNESS, ASTHMATIC CONDITIONS, EYE DAMAGE OR TDI SENSITIZATION SHOULD NOT BE EXPOSED TO THIS PRODUCT.

IN AN NTP STUDY, TDI WAS CARCINOGENIC TO RODENTS GIVEN HIGH ORAL DOSES AND IS INCLUDED IN THE NTP ANNUAL REPORT ON CARCINOGENS. TDI WAS NOT CARCINOGENIC TO RATS IN A TWO-YEAR INHALATION STUDY.

Use with local exhaust. Wear an approved respirator or self-contained breathing apparatus, fitted goggles or face shield and safety glasses, rubber gloves, coveralls, boots, apron and other protective clothing as necessary to prevent contact.

FIRST AID:

Eyes-Immediately wash eyes with running water for 15 minutes.

Get immediate medical attention.

Skin-Wash affected areas with water while removing contaminated clothing. Get immediate medical attention. Launder contaminated clothing before reuse.

Ingestion-If swallowed, DO NOT INDUCE VOMITING. Dilute with water or milk and get immediate medical attention. Never give fluids or induce vomiting if the victim is unconscious or having convulsions.

Inhalation-Move to fresh air. Aid in breathing, if necessary, and get immediate medical attention.

HANDLING AND STORAGE: Keep containers closed and store in a well-ventilated place. Outage of container should be filled with dry inert gas at atmospheric pressure to avoid reaction with moisture. Contamination by moisture or basic compounds can cause dangerous pressure buildup in closed container. Store above 60 F to prevent freezing and isomer separation. If solidified, do not exceed 95 F while thawing to prevent discoloration. Mix before using.

IN CASE OF SPILLS OR LEAKS: Material is a RCRA-regulated product. Spills should be contained, absorbed and placed in suitable containers for disposal in a RCRA-licensed facility.

IN CASE OF FIRE: Use water fog, foam or CO2 extinguishing media. Firefighters should be equipped with self-contained breathing apparatus and turnout gear for protection against TDI vapors and toxic decomposition products.

EMPTY CONTAINERS: All labeled precautions must be observed when handling, storing and transporting empty containers due to product residues. Do not reuse this container unless it is professionally cleaned and reconditioned.

DISPOSAL: Spilled material, unused contents and empty containers must be disposed of in accordance with local, state and federal regulations. Refer to our Material Safety Data Sheet for specific disposal instructions.

IN CASE OF CHEMICAL EMERGENCY: Call CHEMTREC day or night for assistance and information concerning spilled material, fire, exposure and other chemical accidents 800-424-9300.

ATTENTION: This product is sold solely for use by industrial institutions. Refer to our Technical Bulletin and Material Safety Data Sheet regarding safety, usage, applications, hazards, procedures and disposal of this product. Consult your supervisor for additional information.

FOR INDUSTRY USE ONLY.

CAS No.: 584-84-9; 91-08-7.

Proper Shipping Name: Toluene Diisocyanate, Poison B - UN 2078 RQ

Made in USA.

Polymers

0488

MATERIAL SAFETY DATA SHEET

25.1

Mobay Corporation

A Bayer USA INC. COMPANY

Bayer



DIVISION ADDRESS

MOBAY CORPORATION
Polyurethane Division
Mobay Road
Pittsburgh, PA 15205-9741

ISSUE DATE
SUPERSEDES

3/20/89
1/2/89

TRANSPORTATION EMERGENCY: CALL CHEMTREC
TELEPHONE NO: 800-424-9300; DISTRICT OF COLUMBIA: 202-483-7616

MOBAY NON-TRANSPORTATION EMERGENCY NO.:
(412) 923-1800

I. PRODUCT IDENTIFICATION

PRODUCT NAME.....: Mondur TD
PRODUCT CODE NUMBER.....: E-001
CHEMICAL FAMILY.....: Aromatic Isocyanate
CHEMICAL NAME.....: Toluene Diisocyanate (TDI)
SYNONYMS.....: Benzene,1,3-Diisocyanato Methyl-
CAS NUMBER.....: 26471-62-5
T.S.C.A. STATUS.....: This product is listed on the TSCA Inventory.
OSHA HAZARD COMMUNICATION
STATUS.....: This product is hazardous under the criteria of
the Federal OSHA Hazard Communication Standard 29 CFR 1910.1200.
CHEMICAL FORMULA.....: $C_9H_6N_2O_2$

II. HAZARDOUS INGREDIENTS

COMPONENTS:	%:	OSHA-PEL	ACGIH-TLV
2,4-Toluene Diisocyanate* (TDI) CAS# 584-84-9	65	0.02 ppm STEL 0.005 ppm 8HR TWA	0.005 ppm TWA 0.02 ppm STEL
2,6-Toluene Diisocyanate* (TDI) CAS# 91-08-7	35	Not Established	Not Established

*For Section 302 and 313 SARA information refer to Page 6, Section IX, SARA.

III. PHYSICAL DATA

APPEARANCE.....: Liquid
COLOR.....: Water White to Pale Yellow
ODOR.....: Sharp, Pungent
ODOR THRESHOLD.....: Greater than TLV of 0.005 ppm
MOLECULAR WEIGHT.....: 174
MELT POINT/FREEZE POINT....: Approx. 55°F (13°C) for TDI
BOILING POINT.....: Approx. 484°F (251°C) for TDI
VAPOR PRESSURE.....: Approx. 0.025 mm Hg @ 77°F (25°C) for TDI
VAPOR DENSITY (AIR=1).....: 6.0 for TDI
pH.....: Not Applicable
SPECIFIC GRAVITY.....: 1.22 @ 77°F (25°C)
BULK DENSITY.....: 10.18 lbs/gal
SOLUBILITY IN WATER.....: Not Soluble. Reacts slowly with water at normal
room temperature to liberate CO₂ gas.
% VOLATILE BY VOLUME.....: Negligible

Product Code: E-001
Page 1 of 8

IV. FIRE & EXPLOSION DATA

FLASH POINT $^{\circ}\text{F}(^{\circ}\text{C})$: 260 $^{\circ}\text{F}$ (127 $^{\circ}\text{C}$) Pensky Martens Closed Cup

FLAMMABLE LIMITS -

Le1.....: 0.9% for TDI

Ue1.....: 9.5% for TDI

EXTINGUISHING MEDIA.....: Dry chemical (e.g. monoammonium phosphate, potassium sulfate, and potassium chloride), carbon dioxide, high expansion (proteinic) chemical foam, water spray for large fires. Caution: Reaction between water or foam and hot TDI can be vigorous.

SPECIAL FIRE FIGHTING PROCEDURES/UNUSUAL FIRE OR EXPLOSION HAZARDS:

Full emergency equipment with self-contained breathing apparatus and full protective clothing (such as rubber gloves, boots, bands around legs, arms and waist) should be worn by fire fighters. No skin surface should be exposed. During a fire, TDI vapors and other irritating, highly toxic gases may be generated by thermal decomposition or combustion. (See Section VIII). At temperatures greater than 350 $^{\circ}\text{F}$ (177 $^{\circ}\text{C}$) TDI forms carbodiimides with the release of CO_2 , which can cause pressure build-up in closed containers. Explosive rupture is possible. Therefore, use cold water to cool fire-exposed containers.

V. HUMAN HEALTH DATA

PRIMARY ROUTE(S) OF

ENTRY.....: Inhalation. Skin contact from liquid, vapors or aerosols.

EFFECTS AND SYMPTOMS OF OVEREXPOSURE

INHALATION

Acute Exposure. TDI vapors or mist at concentrations above the TLV can irritate (burning sensation) the mucous membranes in the respiratory tract (nose, throat, lungs) causing runny nose, sore throat, coughing, chest discomfort, shortness of breath and reduced lung function (breathing obstruction). Persons with a preexisting, nonspecific bronchial hyperreactivity can respond to concentrations below the TLV with similar symptoms as well as asthma attack. Exposure well above the TLV may lead to bronchitis, bronchial spasm and pulmonary edema (fluid in lungs). These effects are usually reversible. Chemical or hypersensitive pneumonitis, with flu-like symptoms (e.g., fever, chills), has also been reported. These symptoms can be delayed up to several hours after exposure.

Chronic Exposure. As a result of previous repeated overexposures or a single large dose, certain individuals may develop isocyanate sensitization (chemical asthma) which will cause them to react to a later exposure to isocyanate at levels well below the TLV. These symptoms, which can include chest tightness, wheezing, cough, shortness of breath or asthmatic attack, could be immediate or delayed up to several hours after exposure. Similar to many non-specific asthmatic responses, there are reports that once sensitized an individual can experience these symptoms upon exposure to dust, cold air or other irritants. This increased lung sensitivity can persist for weeks and in severe cases for several years. Chronic overexposure to isocyanate has also been reported to cause lung damage (including decrease in lung function) which may be permanent. Sensitization can either be temporary or permanent.

V. HUMAN HEALTH DATA (Continued)

SKIN CONTACT

Acute Exposure. Isocyanates react with skin protein and moisture and can cause irritation which may include the following symptoms: reddening, swelling, rash, scaling or blistering. Cured material is difficult to remove.

Chronic Exposure. Prolonged contact can cause reddening, swelling, rash, scaling, blistering, and, in some cases, skin sensitization. Individuals who have developed a skin sensitization can develop these symptoms as a result of contact with very small amounts of liquid material or as a result of exposure to vapor.

EYE CONTACT

Acute Exposure. Liquid, aerosols or vapors are severely irritating and can cause pain, tearing, reddening and swelling. If left untreated, corneal damage can occur and injury is slow to heal. However, damage is usually reversible. See Section VI for treatment.

Chronic Exposure. Prolonged vapor contact may cause conjunctivitis.

INGESTION

Acute Exposure. Can result in irritation and corrosive action in the mouth, stomach tissue and digestive tract. Symptoms can include sore throat, abdominal pain, nausea, vomiting and diarrhea.

Chronic Exposure. None found.

MEDICAL CONDITIONS

AGGRAVATED BY EXPOSURE...: Asthma, other respiratory disorders (bronchitis, emphysema, bronchial hyperreactivity), skin allergies, eczema.

CARCINOGENICITY.....: No carcinogenic activity was observed in lifetime inhalation studies in rats and mice (International Isocyanate Institute).

NTP.....: The National Toxicology Program reported that TDI caused an increase in the number of tumors in exposed rats over those counted in non-exposed rats. The TDI was administered in corn-oil and introduced into the stomach through a tube. Based on this study, the NTP has listed TDI as a substance that may reasonably be anticipated to be a carcinogen in its Fourth Annual Report on Carcinogens.

IARC.....: IARC has announced that it will list TDI as a substance for which there is sufficient evidence for its carcinogenicity in experimental animals but inadequate evidence for the carcinogenicity of TDI to humans (IARC Monograph 39).

OSHA.....: Not listed.

EXPOSURE LIMITS

OSHA PEL.....: 0.02 ppm STEL/0.005 ppm 8HR TWA for 2,4'-TDI

ACGIH TLV.....: 0.005 ppm TWA/0.02 ppm STEL

VI. EMERGENCY & FIRST AID PROCEDURES

EYE CONTACT.....: Flush with copious amounts of water, preferably lukewarm for at least 15 minutes holding eyelids open all the time. Refer individual to physician or an ophthalmologist for immediate follow-up.

SKIN CONTACT.....: Remove contaminated clothing immediately. Wash affected areas thoroughly with soap and water for at least 15 minutes. Tincture of green soap and water is also effective in removing isocyanates. Wash contaminated clothing thoroughly before reuse. For severe exposures, get under safety shower after removing clothing, then get medical attention. For lesser exposures, seek medical attention if irritation develops or persists after the area is washed.

INHALATION.....: Move to an area free from risk of further exposure. Administer oxygen or artificial respiration as needed. Obtain medical attention. Asthmatic-type symptoms may develop and may be immediate or delayed up to several hours. Consult physician.

INGESTION.....: Do not induce vomiting. Give 1 to 2 cups of milk or water to drink. **DO NOT GIVE ANYTHING BY MOUTH TO AN UNCONSCIOUS PERSON.** Consult physician.

NOTE TO PHYSICIAN.....: Eyes. Stain for evidence of corneal injury. If cornea is burned, instill antibiotic steroid preparation frequently. Workplace vapors have produced reversible corneal epithelial edema impairing vision. Skin. This compound is a known skin sensitizer. Treat symptomatically as for contact dermatitis or thermal burns. Ingestion. Treat symptomatically. There is no specific antidote. Inducing vomiting is contraindicated because of the irritating nature of this compound.

Respiratory. This compound is a known pulmonary sensitizer. Treatment is essentially symptomatic. An individual having a skin or pulmonary sensitization reaction to this material should be removed from exposure to any isocyanate.

VII. EMPLOYEE PROTECTION RECOMMENDATIONS

EYE PROTECTION.....: Liquid chemical goggles or full-face shield. Contact lenses should not be worn. If vapor exposure is causing irritation, use a full-face, air-supplied respirator.

SKIN PROTECTION.....: Chemical resistant gloves (butyl rubber, nitrile rubber, polyvinyl alcohol). However, please note that PVA degrades in water. Cover as much of the exposed skin area as possible with appropriate clothing. If skin creams are used, keep the area covered only by the cream to a minimum.

RESPIRATORY PROTECTION.....: An approved positive pressure air-supplied respirator is required whenever TDI concentrations are not known or exceed the Short-Term Exposure or Ceiling Limit of 0.02 ppm or exceed the 8-hour Time Weighted Average TLV of 0.005 ppm. An approved air-supplied respirator with full facepiece must also be worn during spray application, even if exhaust ventilation is used. For emergency and other conditions where the exposure limits may be greatly exceeded, use an approved, positive pressure self-contained breathing apparatus. TDI has poor warning properties since the odor at which TDI can be smelled is substantially higher than 0.02 ppm. Observe OSHA regulations for respirator use (29 CFR 1910.134).

VII. EMPLOYEE PROTECTION RECOMMENDATIONS (Continued)

VENTILATION.....: Local exhaust should be used to maintain levels below the TLV whenever TDI is handled, processed, or spray-applied. At normal room temperatures (70°F) TDI levels quickly exceed the TLV unless properly ventilated. Standard reference sources regarding industrial ventilation (e.g., ACGIH Industrial Ventilation) should be consulted for guidance about adequate ventilation.

MONITORING.....: TDI exposure levels must be monitored by accepted monitoring techniques to ensure that the TLV is not exceeded. (Contact Mobay for guidance). See Volume 1 (Chapter 17) and Volume 3 (Chapter 3) in Patty's Industrial Hygiene and Toxicology for sampling strategy.

MEDICAL SURVEILLANCE.....: Medical supervision of all employees who handle or come in contact with TDI is recommended. These should include preemployment and periodic medical examinations with respiratory function tests (FEV, FVC as a minimum). Persons with asthmatic-type conditions, chronic bronchitis, other chronic respiratory diseases or recurrent skin eczema or sensitization should be excluded from working with TDI. Once a person is diagnosed as sensitized to TDI, no further exposure can be permitted.

OTHER.....: Safety showers and eyewash stations should be available. Educate and train employees in safe use of product. Follow all label instructions.

VIII. REACTIVITY DATA

STABILITY.....: Stable under normal conditions.

POLYMERIZATION.....: May occur if in contact with moisture or other materials which react with isocyanates. Self-reaction may occur at temperatures over 350°F (177°C) or at lower temperatures if sufficient time is involved. See Section IV.

INCOMPATIBILITY

(MATERIALS TO AVOID).....: Water, amines, strong bases, alcohols. Will cause some corrosion to copper alloys and aluminum. Reacts with water to form heat, CO₂ and insoluble ureas.

HAZARDOUS DECOMPOSITION

PRODUCTS.....: By high heat and fire: carbon monoxide, oxides of nitrogen, traces of HCN, TDI vapors and mist.

IX. SPILL OR LEAK PROCEDURES

STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED: Evacuate and ventilate spill area; dike spill to prevent entry into water system; wear full protective equipment, including respiratory equipment during clean-up. (See Section VII).

Major Spill: Call Mobay at 412/923-1800. If transportation spill, call CHEMTREC 800/424-9300. If temporary control of isocyanate vapor is required, a blanket of protein foam (available at most fire departments) may be placed over the spill. Large quantities may be pumped into closed, but not sealed, container for disposal.

IX. SPILL OR LEAK PROCEDURES (Continued)

Minor Spill: Absorb isocyanate with sawdust or other absorbent, shovel into suitable unsealed containers, transport to well-ventilated area (outside) and treat with neutralizing solution: mixture of water (80%) with non-ionic surfactant Tergitol TMN-10 (20%), or; water (90%), concentrated ammonia (3-8%) and detergent (2%). Add about 10 parts of neutralizer per part of isocyanate, with mixing. Allow to stand uncovered for 48 hours to let CO₂ escape.

Clean-up: Decontaminate floor with decontamination solution letting stand for at least 15 minutes.

CERCLA (SUPERFUND) REPORTABLE QUANTITY: 100 pounds for TDI

WASTE DISPOSAL METHOD.....: Follow all federal, state or local regulations. TDI must be disposed of in a permitted incinerator or landfill. Incineration is the preferred method for liquids. Solids are usually incinerated or landfilled. Empty containers must be handled with care due to product residue. Decontaminate containers prior to disposal. Empty decontaminated containers should be crushed to prevent reuse. **DO NOT HEAT OR CUT EMPTY CONTAINER WITH ELECTRIC OR GAS TORCH.** (See Sections IV and VIII). Vapors and gases may be highly toxic.

RCRA STATUS.....: TDI is listed as a hazardous waste (No. U-223) under Title 40 Code of Federal Regulations, Section 261.33 (f). The residue from decontaminating a TDI spill is also classified as a hazardous waste under Section 261.3 (c)(2) or RCRA.

SUPERFUND AMENDMENTS AND REAUTHORIZATION ACT (SARA), TITLE III:

Section 302 - Extremely Hazardous Substances: 2,4-Toluene Diisocyanate (TDI)
CAS# 584-84-9 = 65%
2,6-Toluene Diisocyanate (TDI)
CAS# 91-08-7 = 35%

Section 313 - Toxic Chemicals: 2,4-Toluene Diisocyanate (TDI)
CAS# 584-84-9 = 65%
2,6-Toluene Diisocyanate (TDI)
CAS# 91-08-7 = 35%

X. SPECIAL PRECAUTIONS & STORAGE DATA

STORAGE TEMPERATURE

(MIN./MAX.).....: 70°F (21°C)/90°F (32°C)

AVERAGE SHELF LIFE.....: 12 months

SPECIAL SENSITIVITY

(HEAT, LIGHT, MOISTURE): If container is exposed to high heat, 375°F (177°C) it can be pressurized and possibly rupture. TDI reacts slowly with water to form polyureas and liberates CO₂ gas. This gas can cause sealed containers to expand and possibly rupture.

PRECAUTIONS TO BE TAKEN

IN HANDLING AND STORING.: Store in tightly closed containers to prevent moisture contamination. Do not reseal if contamination is suspected. Prevent all contact. Do not breathe the vapors. Warning properties (irritation of the eyes, nose and throat or odor) are not adequate to prevent chronic overexposure from inhalation. This material can produce asthmatic sensitization upon either single inhalation exposure to a relatively high concentration or upon repeated inhalation exposures to lower concentrations. Exposure to vapors of heated TDI can be extremely dangerous. Employee education and training in safe handling of this product are required under the OSHA Hazard Communication Standard.

XI. SHIPPING DATA

D.O.T. SHIPPING NAME.....: Toluene Diisocyanate
TECHNICAL SHIPPING NAME....: Toluene Diisocyanate
D.O.T. HAZARD CLASS.....: Poison B
UN/NA NO.....: UN 2078
PRODUCT RQ.....: 100 lbs.
D.O.T. LABELS.....: Poison
D.O.T. PLACARDS.....: Poison
FRT. CLASS BULK.....: Toluene Diisocyanate
FRT. CLASS PKG.....: Chemicals, NOI (Toluene Diisocyanate) NMFC 60000
PRODUCT LABEL.....: Mondur TD Product Label

XII. ANIMAL TOXICITY DATA

ACUTE TOXICITY

ORAL, LD50.....: Range of 4130-6170 mg/kg (Rats and Mice)
DERMAL, LD50.....: Greater than 10,000 mg/kg (Rabbits)
INHALATION, LC50.(4 hr)..: Range of 16-50 ppm (Rat), 10 ppm (Mouse),
11 ppm (Rabbit), 13 ppm (Guinea Pig).
EYE EFFECTS.....: Severe eye irritant capable of inducing corneal
opacity.

SKIN EFFECTS.....: Moderate skin irritant. Primary dermal
irritation score: 4.12/8.0 (Draize). However, repeated or prolonged
contact may culminate in severe skin irritation and/or corrosion.

SENSITIZATION.....: Skin sensitizer in guinea pigs. One study
using guinea pigs reported that repeated skin contact with TDI caused
respiratory sensitization. Although poorly defined in experimental animal
models, TDI is known to be a pulmonary sensitizer in humans. In addition,
there is some evidence that cross-sensitization between different types of
diisocyanates may occur.

SUB-CHRONIC/CHRONIC TOXICITY: Sub-chronic and chronic animal studies show
that the primary effects of inhaling vapors and/or aerosols of TDI are
restricted to the pulmonary systems. Emphysema, pulmonary edema, pneumonitis
and rhinitis are common pathologic effects. Extended exposures to as low as
0.1 ppm TDI have induces pulmonary inflammation.

OTHER

CARCINOGENICITY.....: The NTP conducted carcinogenesis studies of a
commercial grade TDI using rats and mice in which the test material was
diluted in corn oil and administered by gavage. The investigators concluded
that TDI was carcinogenic in male and female rats (fibrosarcomas, pancreatic
adenomas, neoplastic liver nodules and mammary gland fibrosarcomas) and
female mice (hemangiosarcomas and hepatocellular adenomas). However,
chronic inhalation studies in which rats and mice were exposed to 0.05 and
0.15 ppm TDI (10-30 times recommended TLV, 8-hr level) induced no
treatment-related tumorigenic effects. In these studies, both exposure
levels produced extensive irritation to the nasal passages and upper
respiratory system of the test animals indicating that suitable effective
exposures were administered.

MUTAGENICITY.....: TDI is positive in the Ames assay with
activation. However, mammalian cell transformation assays using human lung
cells and Syrian hamster kidney cells were negative, as were micronucleus
tests using rats and mice.

Product Code: E-001

Page 7 of 8

XII. ANIMAL TOXICITY DATA (Continued)

TERATOGENICITY.....: Rats were exposed to an 80:20 mixture of 2,4- and 2,6- toluene diisocyanate vapor at analytical concentrations of 0.021, 0.12 and 0.48 ppm. Minimal fetotoxicity was observed at a maternally toxic concentrations of 0.48 ppm. The NOEL for maternal and developmental toxicity was 0.12 ppm. No embryotoxicity or teratogenicity was observed.

AQUATIC TOXICITY.....: LC₅₀ - 96 hr (static): 165 mg/liter (Fathead minnow)
LC₅₀ - 96 hr (static): Greater than 508 mg/liter (Grass shrimp)
LC₅₀ - 24 hr (static): Greater than 500 mg/liter (Daphnia magna)

XIII. APPROVALS

REASON FOR ISSUE.....: Revising TLV in Section II and V
PREPARED BY.....: G. L. Copeland
APPROVED BY.....: D. R. Hackathorn
TITLE.....: Manager, Product Safety

4.03 Submit a copy or reasonable facsimile of any hazard information (other than an MSDS) that is provided to your customers/users regarding the listed substance or any formulation containing the listed substance. Indicate whether this information has been submitted by circling the appropriate response.

Yes 1

No (2)

4.04 For each activity that uses the listed substance, circle all the applicable number(s) corresponding to each physical state of the listed substance during the activity listed. Physical states for importing and processing activities are determined at the time you import or begin to process the listed substance. Physical states for manufacturing, storage, disposal and transport activities are determined using the

CBI

[]

Activity	Physical State				
	Solid	Slurry	Liquid	Liquified Gas	Gas
Manufacture	1	2	3	4	5
Import	1	2	3	4	5
Process	1	2	(3)	4	5
Store	1	2	(3)	4	5
Dispose	1	2	3	4	5
Transport	1	2	3	4	5

[] Mark (X) this box if you attach a continuation sheet.

4.05 Particle Size -- If the listed substance exists in particulate form during any of the following activities, indicate for each applicable physical state the size and the percentage distribution of the listed substance by activity. Do not include particles ≥ 10 microns in diameter. Measure the physical state and particle sizes for importing and processing activities at the time you import or begin to process the listed substance. Measure the physical state and particle sizes for manufacturing storage, disposal and transport activities using the final state of the product.

CBI

☐

<u>Physical State</u>		<u>Manufacture</u>	<u>Import</u>	<u>Process</u>	<u>Store</u>	<u>Dispose</u>	<u>Transport</u>
Dust	<1 micron			N/A	N/A		
	1 to <5 microns			N/A	N/A		
	5 to <10 microns			N/A	N/A		
Powder	<1 micron			N/A	N/A		
	1 to <5 microns			N/A	N/A		
	5 to <10 microns			N/A	N/A		
Fiber	<1 micron			N/A	N/A		
	1 to <5 microns			N/A	N/A		
	5 to <10 microns			N/A	N/A		
Aerosol	<1 micron			N/A	N/A		
	1 to <5 microns			N/A	N/A		
	5 to <10 microns			N/A	N/A		

☐ Mark (X) this box if you attach a continuation sheet.

SECTION 5 ENVIRONMENTAL FATE

PART A RATE CONSTANTS AND TRANSFORMATION PRODUCTS

5.01 Indicate the rate constants for the following transformation processes.

a. Photolysis:

Absorption spectrum coefficient (peak) 871 (1/M cm) at 284 nm

Reaction quantum yield, ϕ No information at nm

Direct photolysis rate constant, k_p , at ... 1.2×10^{-3} 1/hr when NO₂ ~~degrades~~
photolysis rate is 0.37/hr ⁽²⁾

b. Oxidation constants at 25°C:

For ¹O₂ (singlet oxygen), k_{ox} No information 1/M hr

For RO₂ (peroxy radical), k_{ox} No information 1/M hr

c. Five-day biochemical oxygen demand, BOD₅ ... Not applicable due to mg/l
reaction with water

d. Biotransformation rate constant:

For bacterial transformation in water, k_b ... No oxygen consumed in 1/hr

Specify culture modified MITI test (3)

e. Hydrolysis rate constants:

For base-promoted process, k_b No information 1/M hr

For acid-promoted process, k_A No information 1/M hr

For neutral process, k_N No information 1/hr

f. Chemical reduction rate (specify conditions) Not expected

g. Other (such as spontaneous degradation) ... Polyurea formation under
hydrolytic conditions (4)

☐ Mark (X) this box if you attach a continuation sheet.

PART B PARTITION COEFFICIENTS

5.02 a. Specify the half-life of the listed substance in the following media.

<u>Media</u>	<u>Half-life (specify units)</u>
Groundwater	<u><< 1 day in water solution (4)</u>
Atmosphere	<u>26 hour (2)</u>
Surface water	<u><< 1 day in water solution (4)</u>
Soil	<u>< 1 day (4)</u>

b. Identify the listed substance's known transformation products that have a half-life greater than 24 hours.

<u>CAS No.</u>	<u>Name</u>	<u>Half-life (specify units)</u>	<u>Media</u>
<u>Not found</u>	<u>Polyurea</u>	<u>> 1 year</u>	<u>in water and soil (4)</u>
<u>95-80-7</u>	<u>2,4-Toluene diamine</u>	<u>< 1 day</u>	<u>} in biological waste- water treatment plant (4)</u>
<u>823-40-5</u>	<u>2,6-Toluene diamine</u>	<u>< 1 day</u>	
<u>5206-52-0</u>	<u>Urea, N,N'-bis(3-isocyanato-4-methylphenyl)</u>	<u>Unknown half-life</u>	<u>(5,6)</u>

5.03 Specify the octanol-water partition coefficient, K_{ow} ... reacts with both at 25°C
Method of calculation or determination octanol and water

5.04 Specify the soil-water partition coefficient, K_d reacts with water at 25°C
Soil type

5.05 Specify the organic carbon-water partition coefficient, K_{oc} reacts with water at 25°C

5.06 Specify the Henry's Law Constant, H reacts with water atm-m³/mole

☐ Mark (X) this box if you attach a continuation sheet.

5.07 List the bioconcentration factor (BCF) of the listed substance, the species for which it was determined, and the type of test used in deriving the BCF.

<u>Bioconcentration Factor</u>	<u>Species</u>	<u>Test</u> ¹
<u>None detected</u>	<u>Moina macrocopa Straus</u>	<u>Not defined (4)</u>
<u>None detected</u>	<u>Cyprinus carpio</u>	<u>Not defined (4)</u>
<u> </u>	<u> </u>	<u> </u>

¹Use the following codes to designate the type of test:

F = Flowthrough
S = Static

- (1) Phillips and Nachod, eds., Organic Electronic Spectral Data, Vol. IV, pg. 200.
- (2) K. H. Becker, V. Bastian and Th. Klein, The reactions of toluenediisocyanate, toluenediamine and methylenedianiline under simulated atmospheric conditions, J. Photochem, and Photobiol., A: Chemistry, 45 (1988) 195-205.
- (3) N. Caspers, B. Hamburger, R. Kanne and Waklebert, Ecotoxicity of TDI, MDI, TDA and MDA, Report to the International Isocyanate Institute, E-CE-41, 1986. Quoted in D. S. Gilbert, Fate of TDI and MDI in Air, Soil and Water, Polyurethanes World Congress 1987, Proceedings of the SPI/FSK.
- (4) F. K. Brochhagen and B. M. Grievson, Environmental aspects of isocyanates in water and soil, Cellular Polymers, 3 (1984) 11-17.
- (5) K. Marcali, Microdetermination of toluenediisocyanate in atmosphere, Anal. Chem. 29 (1957) 552-558.
- (6) G. A. Campbell, T. J. Dearlove and W. C. Meluch, Diisocyanatotolyl urea, U. S. Patent 3,906,019 (1975), Chem. Abs. 84:5645h.

☐ Mark (X) this box if you attach a continuation sheet.

6.04 For each market listed below, state the quantity sold and the total sales value of the listed substance sold or transferred in bulk during the reporting year.

☐

<u>Market</u>	<u>Quantity Sold or Transferred (kg/yr)</u>	<u>Total Sales Value (\$/yr)</u>
Retail sales		
Distribution -- Wholesalers	Not Required For Listed Substance	
Distribution -- Retailers		
Intra-company transfer		
Repackagers		
Mixture producers		
Article producers		
Other chemical manufacturers or processors		
Exporters		
Other (specify)		

6.05 Substitutes -- List all known commercially feasible substitutes that you know exist for the listed substance and state the cost of each substitute. A commercially feasible substitute is one which is economically and technologically feasible to use in your current operation, and which results in a final product with comparable performance in its end uses.

CBI

☐

<u>Substitute</u>	<u>Cost (\$/kg)</u>
Unknown	Unknown

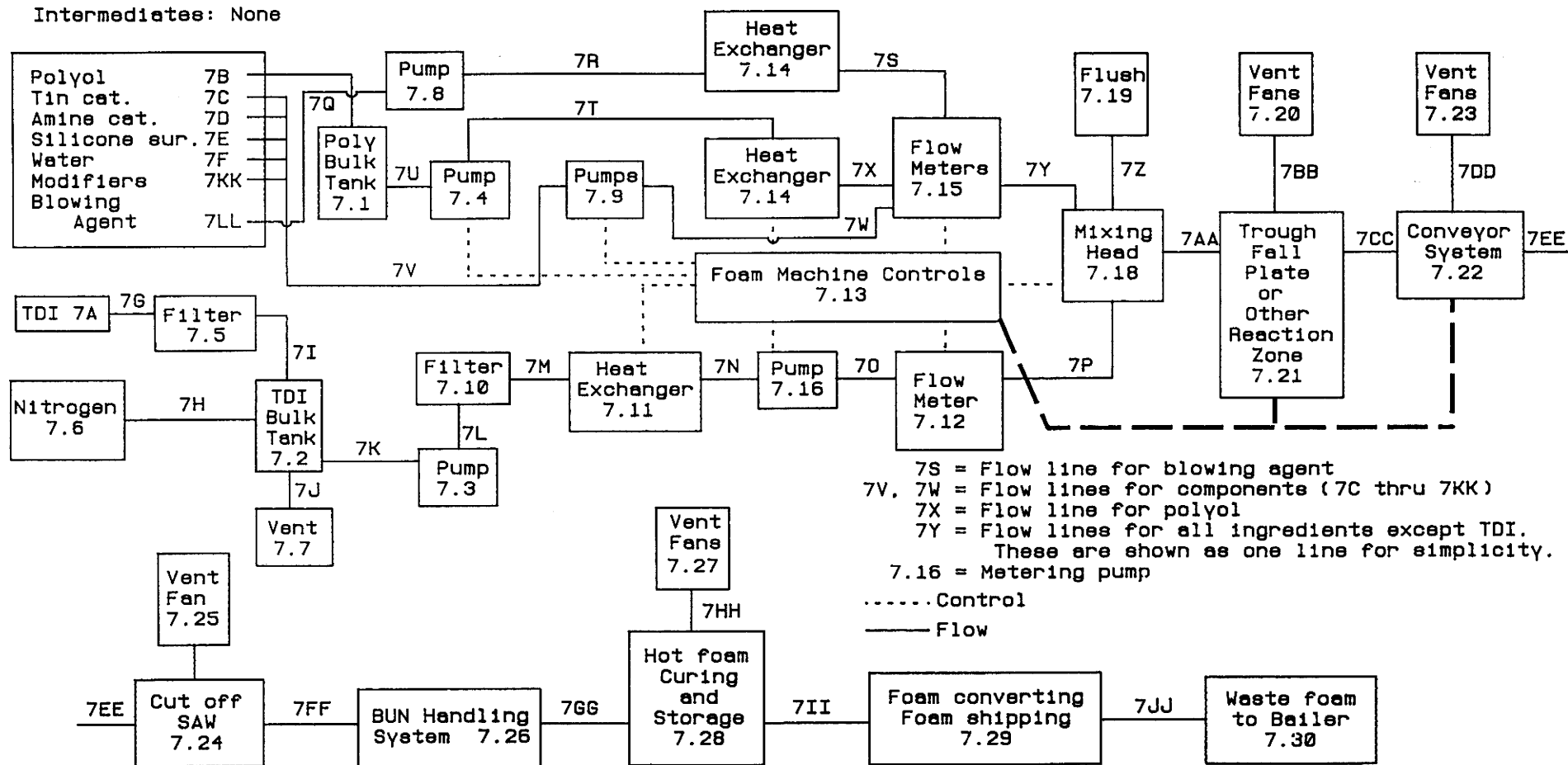
☐ Mark (X) this box if you attach a continuation sheet.

EDDYSTONE

7.01 PROCESSOR

Process Type: Flexible Slabstock Polyurethane Foam
Manufacturing Process

Intermediates: None



FOAM MODIFIERS

7KK-A Fire Retardant
7KK-B Pigments
7KK-C Germicide

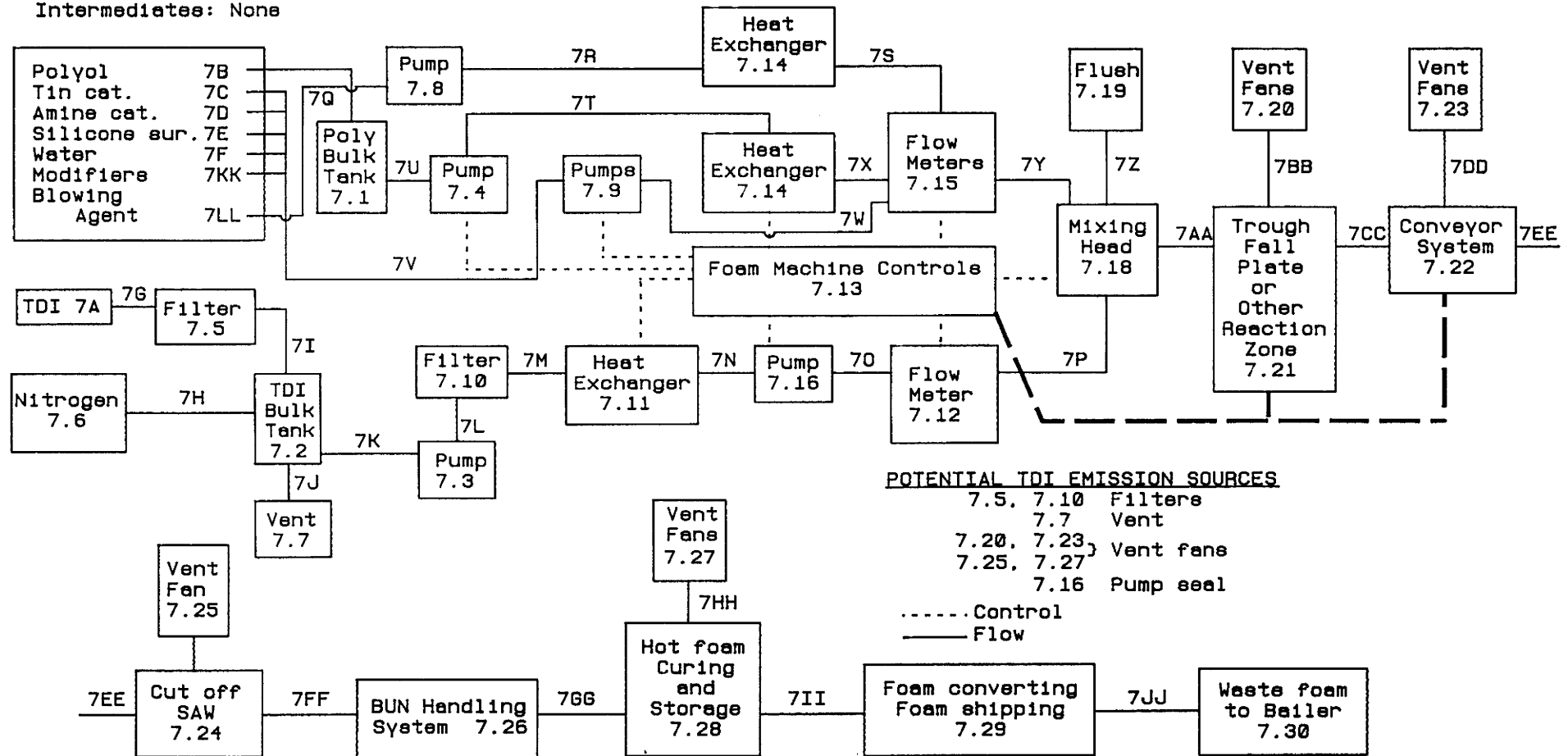
NOTE: Every ingredient in the process has its own separate line to the mix head. Just prior to the mix head, there is a 3-way valve for re-cycle back to originating tank. These are not shown for the sake of simplicity.

EDDYSTONE

7.03 EMISSIONS

Process Type: Flexible Slabstock Polyurethane Foam
Manufacturing Process

Intermediates: None



FOAM MODIFIERS

7KK-A Fire Retardant
7KK-B Pigments
7KK-C Germicide

NOTE: Pump 7.3 is totally enclosed - no seals, movements, etc.

7.04 Describe the typical equipment types for each unit operation identified in your process block flow diagram(s). If a process block flow diagram is provided for more than one process type, photocopy this question and complete it separately for each process type.

CBI

☐ Process type Flexible Slabstock - Polyurethane Foam

<u>Unit Operation ID Number</u>	<u>Typical Equipment Type</u>	<u>Operating Temperature Range (°C)</u>	<u>Operating Pressure Range (mm Hg)</u>	<u>Vessel Composition</u>
<u>7.1</u>	<u>Polyol Bulk Tank</u>	<u>25</u>	<u>760</u>	<u>Glass Lined Steel</u>
<u>7.2</u>	<u>TDI Bulk Tank</u>	<u>25</u>	<u>760</u>	<u>Glass Lined Steel</u>
<u>7.3</u>	<u>Chem Pump</u>	<u>25</u>	<u>< 76,000</u>	<u>Steel</u>
<u>7.4</u>	<u>Gear Pump</u>	<u>25</u>	<u>< 76,000</u>	<u>Steel</u>
<u>7.5</u>	<u>Filter</u>	<u>25</u>	<u>< 76,000</u>	<u>Polypropylene</u>
<u>7.6</u>	<u>Nitrogen</u>	<u>25</u>	<u>760</u>	<u>Steel</u>
<u>7.7</u>	<u>Vent</u>	<u>25</u>	<u>760</u>	<u>Steel</u>
<u>7.8</u>	<u>Pump</u>	<u>25</u>	<u>< 76,000</u>	<u>Steel</u>
<u>7.9</u>	<u>Pumps</u>	<u>25</u>	<u>< 76,000</u>	<u>Steel</u>
<u>7.10</u>	<u>Filter</u>	<u>25</u>	<u>< 76,000</u>	<u>Polypropylene</u>
<u>7.11</u>	<u>Heat Exchanger</u>	<u>25</u>	<u>< 76,000</u>	<u>Stainless Steel</u>
<u>7.12</u>	<u>Flow Meter</u>	<u>25</u>	<u>< 76,000</u>	<u>Glass</u>
<u>7.13</u>	<u>Foam Machine Controls</u>	<u>25</u>	<u>N/A</u>	<u>N/A</u>
<u>7.14</u>	<u>Heat Exchangers</u>	<u>25</u>	<u>< 76,000</u>	<u>Stainless Steel</u>
<u>7.15</u>	<u>Flow Meters</u>	<u>25</u>	<u>< 76,000</u>	<u>Glass</u>
<u>7.16</u>	<u>Pump</u>	<u>25</u>	<u>< 76,000</u>	<u>Steel</u>
<u>7.18</u>	<u>Mix Head</u>	<u>25</u>	<u>< 76,000</u>	<u>Steel</u>

☒ Mark (X) this box if you attach a continuation sheet.

7.04 Flexible Slabstock, Polyurethane Foam

<u>Unit Operation ID Number</u>	<u>Typical Equipment Type</u>	<u>Operating Temperature Range (°C)</u>	<u>Operating Pressure Range (mm Hg)</u>	<u>Vessel Composition</u>
7.19	55 Gallon Drums	25	760	Steel
7.20	Vent Fans	25	760	Steel
7.21	Fall Plate	25	760	Steel
7.22	Conveyor	25	760	Steel
7.23	Vent Fans	25	760	Steel
7.24	Cut-Off Saw	25	760	Steel
7.25	Vent Fan	25	760	Steel
7.26	Conveyor/Run Grabber	25	760	Steel
7.27	Vent Fans	25	760	Steel
7.28	Converting Operations	N/A	N/A	N/A
7.30	Waste Foam	N/A	N/A	N/A

7.05 Describe each process stream identified in your process block flow diagram(s). If a process block flow diagram is provided for more than one process type, photocopy this question and complete it separately for each process type.

CBI

☐ Process type Polyurethane Foam - Slabstock Machine

Process Stream ID Code	Process Stream Description	Physical State ¹	Stream Flow (kg/yr)
7B, 7U, 7T, 7X, 7Y	Polyol	OL	5,309,000
7G, 7I, 7K, 7L, 7M			
7N, 7O, 7P	Toluene Di-isocyanate	OL	2,011,600
7C, 7V, 7W, 7Y	Catalyst, Tin	OL	42,300
7D, 7V, 7W, 7Y	Catalyst, Amine	OL	27,800
7E, 7V, 7W, 7Y	Surfactant, Silicone	OL	54,500
7F, 7V, 7W, 7Y	Water	AL	176,000
7KK-A, 7V, 7W, 7Y	Fire Retardant	OL	39,800

¹Use the following codes to designate the physical state for each process stream:

GC = Gas (condensable at ambient temperature and pressure)
 GU = Gas (uncondensable at ambient temperature and pressure)
 SO = Solid
 SY = Sludge or slurry
 AL = Aqueous liquid
 OL = Organic liquid
 IL = Immiscible liquid (specify phases, e.g., 90% water, 10% toluene)

☒ Mark (X) this box if you attach a continuation sheet.

7.05 Describe each process stream identified in your process block flow diagram(s). If a process block flow diagram is provided for more than one process type, photocopy this question and complete it separately for each process type.

CBI

☐ Process type Polyurethane Foam - Slabstock Machine - Continuation Page

Process Stream ID Code	Process Stream Description	Physical State ¹	Stream Flow (kg/yr)
7Q, R, S, Y	Blowing Agent	OL	185,700
7FF	Polyurethane Foam	SO	16,300,000

¹Use the following codes to designate the physical state for each process stream:

GC = Gas (condensable at ambient temperature and pressure)
 GU = Gas (uncondensable at ambient temperature and pressure)
 SO = Solid
 SY = Sludge or slurry
 AL = Aqueous liquid
 OL = Organic liquid
 IL = Immiscible liquid (specify phases, e.g., 90% water, 10% toluene)

☐ Mark (X) this box if you attach a continuation sheet.

7.06 Characterize each process stream identified in your process block flow diagram(s).
If a process block flow diagram is provided for more than one process type, photocopy
this question and complete it separately for each process type. (Refer to the
CBI instructions for further explanation and an example.)

☐ Process type Polyurethane Foam Flexible Slabstock Machine

a.	b.	c.	d.	e.
Process Stream ID Code	Known Compounds ¹	Concen- trations ^{2,3} (% or ppm)	Other Expected Compounds	Estimated Concentrations (% or ppm)
7B, 7U, 7T, 7X, 7Y	Polyol Resin	100%	None	Not Applicable
7C, 7V, 7W, 7Y	Stannous Octoate	16.7%	None	Not Applicable
	Di-isononyl phthalate	83.3%		
7D, 7V, 7W 7Y	Amine Catalyst	10%	None	Not Applicable
	Dipropylene Glycol	90%		

7.06 continued below

☒ Mark (X) this box if you attach a continuation sheet.

7.06 Characterize each process stream identified in your process block flow diagram(s).
 If a process block flow diagram is provided for more than one process type, photocopy
 this question and complete it separately for each process type. (Refer to the
 CBI instructions for further explanation and an example.)

☐ Process type

a.	b.	c.	d.	e.
Process Stream ID Code	Known Compounds ¹	Concen- trations ^{2,3} (% or ppm)	Other Expected Compounds	Estimated Concentrations (% or ppm)
7E, 7V, 7W 7Y	Silicone	100%	None	Not Applicable
7F, 7V, 7W, 7Y	Water	100%	None	Not Applicable
7LL, 7R, 7S 7Y	Blowing Agent	100%	None	Not Applicable

7.06 continued below

☒ Mark (X) this box if you attach a continuation sheet.

7.06 Characterize each process stream identified in your process block flow diagram(s). If a process block flow diagram is provided for more than one process type, photocopy this question and complete it separately for each process type. (Refer to the CBI instructions for further explanation and an example.)

☐ Process type

a.	b.	c.	d.	e.
Process Stream ID Code	Known Compounds ¹	Concentrations ^{2,3} (% or ppm)	Other Expected Compounds	Estimated Concentrations (% or ppm)
7KK-A, 7V 7W, 7Y	Fire Retardant	100%	None	Not Applicable
7KK-B, 7V 7W, 7Y	Pigments	100%	None	Not Applicable
7G, 7I, 7K, 7L, 7M, 7N, 7O, 7P	Toluene di-isocyanate	99.5	Hydrolyzable Chloride	0.5%

7.06 continued below

☐ Mark (X) this box if you attach a continuation sheet.

7.06 (continued)

¹For each additive package introduced into a process stream, specify the compounds that are present in each additive package, and the concentration of each component. Assign an additive package number to each additive package and list this number in column b. (Refer to the instructions for further explanation and an example. Refer to the glossary for the definition of additive package.)

Additive Package Number	Components of Additive Package	Concentrations (% or ppm)
<u>1</u>	Not Applicable	Not Applicable
<u>2</u>		
<u>3</u>		
<u>4</u>		
<u>5</u>		

²Use the following codes to designate how the concentration was determined:

A = Analytical result
E = Engineering judgement/calculation

³Use the following codes to designate how the concentration was measured:

V = Volume
W = Weight

☐ Mark (X) this box if you attach a continuation sheet.

PART A RESIDUAL TREATMENT PROCESS DESCRIPTION

8.01 In accordance with the instructions, provide a residual treatment block flow diagram which describes the treatment process used for residuals identified in question 7.01.

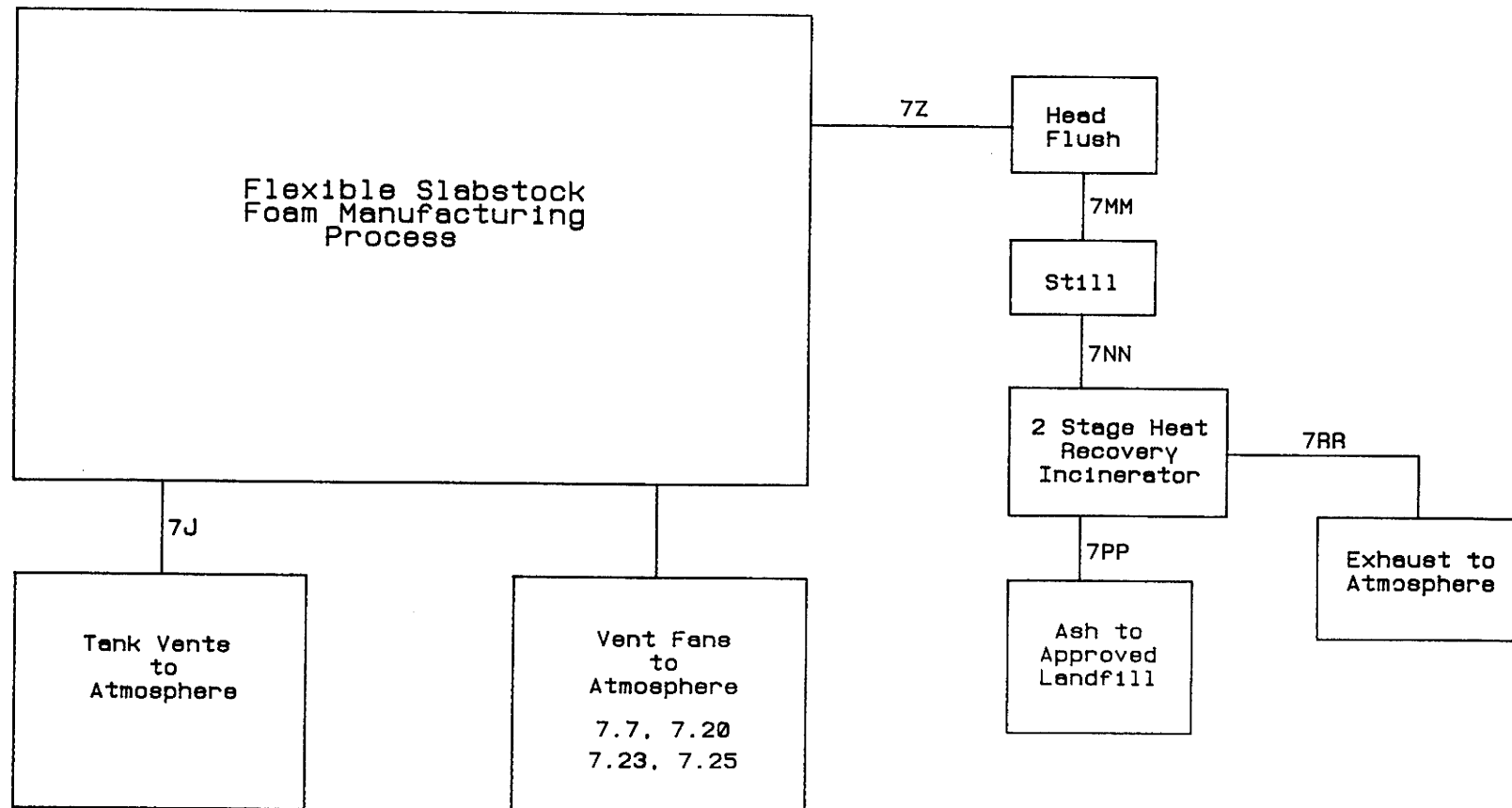
CBI

☐ Process type Flexible Polyurethane Foam Slabstock Machine

☐ Mark (X) this box if you attach a continuation sheet.

EDDYSTONE

8.01 Residual Process Stream - Flexible Slabstock Machine



PART B RESIDUAL GENERATION AND CHARACTERIZATION

8.05 Characterize each process stream identified in your residual treatment block flow diagram(s). If a residual treatment block flow diagram is provided for more than one process type, photocopy this question and complete it separately for each process type. (Refer to the instructions for further explanation and an example.)

CBI

[] Process type Flexible Slabstock Polyurethane Foam Manufacturing

a.	b.	c.	d.	e.	f.	g.
Stream ID Code	Type of Hazardous Waste ¹	Physical State of Residual ²	Known Compounds ³	Concentrations (% or ppm) ^{4,5,6}	Other Expected Compounds	Estimated Concentrations (% or ppm)
7I	R, T	GU	TDI	30 (E) (W)	None	NA
7.7	R, T	GU	TDI	.26 Mg/M ³	None	NA
7.20, 7.23, 7.25			CO ₂	.006 Kg/M ³		
			Blowing Agent	.004 Kg/M ³		
7Z	T	OL	Methylene Chloride	40%	None	NA
7MM			Polyol	57%		
			Polyurethane	2%		
			Tin Catalyst	< 1%		
			Amine Catalyst			
			Silicone Modifier			
			Water			

8.05 continued below

[X] Mark (X) this box if you attach a continuation sheet.

PART B RESIDUAL GENERATION AND CHARACTERIZATION

8.05 Characterize each process stream identified in your residual treatment block flow diagram(s). If a residual treatment block flow diagram is provided for more than one process type, photocopy this question and complete it separately for each process type. (Refer to the instructions for further explanation and an example.)

☐ Process type

a.	b.	c.	d.	e.	f.	g.
Stream ID Code	Type of Hazardous Waste ¹	Physical State of Residual ²	Known Compounds ³	Concentrations (% or ppm) ^{4,5,6}	Other Expected Compounds	Estimated Concentrations (% or ppm)
7NN	T	OL	Polyol	98+%	Unknown	Unknown
			Tin Catalyst	<2%		
			Amine Catalyst			
			Silicone			
			Modifiers			
			Water			
			Methylene Chloride	<.5%		
7PP	NA (See Below)	SO	Methylene Chloride	1.2 mg/Kg.		
			Benzene	0.3 mg/Kg.		
7RR	NA	GU	Unknown	Unknown	Unknown	Unknown

8.05 continued below

Non-Hazardous by Determination

☐ Mark (X) this box if you attach a continuation sheet.

8.05 (continued)

³For each additive package introduced into a process stream, specify the compounds that are present in each additive package, and the concentration of each component. Assign an additive package number to each additive package and list this number in column d. (Refer to the instructions for further explanation and an example. Refer to the glossary for the definition of additive package.)

Additive Package Number	Components of Additive Package	Concentrations (% or ppm)
<u>1</u>	Not Applicable	Not Applicable
<u>2</u>		
<u>3</u>		
<u>4</u>		
<u>5</u>		

⁴Use the following codes to designate how the concentration was determined:

A = Analytical result

E = Engineering judgement/calculation

8.05 continued below

☐ Mark (X) this box if you attach a continuation sheet.

8.05 (continued)

⁵Use the following codes to designate how the concentration was measured:

V = Volume

W = Weight

⁶Specify the analytical test methods used and their detection limits in the table below. Assign a code to each test method used and list those codes in column e.

<u>Code</u>	<u>Method</u>	<u>Detection Limit</u> <u>(± ug/l)</u>
<u>1</u>	Not Applicable	Not Applicable
<u>2</u>		
<u>3</u>		
<u>4</u>		
<u>5</u>		
<u>6</u>		

☐ Mark (X) this box if you attach a continuation sheet.

8.06 Characterize each process stream identified in your residual treatment block flow diagram(s). If a residual treatment block flow diagram is provided for more than one process type, photocopy this question and complete it separately for each process type. (Refer to the instructions for further explanation and an example.)

CBI

☐ Process type Flexible Polyurethane Foam Machine

a. Stream ID Code	b. Waste Description Code ¹	c. Management Method Code ²	d. Residual Quantities (kg/yr)	e. Management of Residual (%) On-Site Off-Site	f. Costs for Off-Site Management (per kg)	g. Changes in Management Methods
7Z, 7MM	A01	2SR	16,100	100% 0	NA	None
7NN	A03	4I	9,901	100% 0	NA	None
7PP	A10	3D	27,000*	0 100	\$0.18	None
Note: This is for all ash, not just residue from 7PP						
7RR	B57	M5a	Unknown	100% 0	NA	None

¹Use the codes provided in Exhibit 8-1 to designate the waste descriptions

²Use the codes provided in Exhibit 8-2 to designate the management methods

* Includes all ash - not just from stream 7PP.

☒ Mark (X) this box if you attach a continuation sheet.

CBI

[]

$$\frac{7.7, 7.20, \dots}{7.23, 7.25}$$

²Use the codes provided in Exhibit 8-2 to designate the management methods

[]

8.22 Describe the combustion chamber design parameters for each of the three largest (by capacity) incinerators that are used on-site to burn the residuals identified in your process block or residual treatment block flow diagram(s).

CBI

☐

<u>Incinerator</u>	<u>Combustion Chamber Temperature (°C)</u>		<u>Location of Temperature Monitor</u>		<u>Residence Time In Combustion Chamber (seconds)</u>	
	<u>Primary</u>	<u>Secondary</u>	<u>Primary</u>	<u>Secondary</u>	<u>Primary</u>	<u>Secondary</u>
1	705	900	Top of Chamber	Breech Zone	Unknown	0.44
2						
3						

Indicate if Office of Solid Waste survey has been submitted in lieu of response by circling the appropriate response.

Yes 1

No 2

8.23 Complete the following table for the three largest (by capacity) incinerators that are used on-site to burn the residuals identified in your process block or residual treatment block flow diagram(s).

CBI

☐

<u>Incinerator</u>	<u>Air Pollution Control Device¹</u>	<u>Types of Emissions Data Available</u>
1	None	Unknown
2		
3		

Indicate if Office of Solid Waste survey has been submitted in lieu of response by circling the appropriate response.

Yes 1

No 2

¹Use the following codes to designate the air pollution control device:

S = Scrubber (include type of scrubber in parenthesis)

E = Electrostatic precipitator

O = Other (specify) _____

☐ Mark (X) this box if you attach a continuation sheet.

PART A EMPLOYMENT AND POTENTIAL EXPOSURE PROFILE

9.01 Mark (X) the appropriate column to indicate whether your company maintains records on the following data elements for hourly and salaried workers. Specify for each data element the year in which you began maintaining records and the number of years the records for that data element are maintained. (Refer to the instructions for further explanation and an example.)

CBI

☐

Data Element	Data are Maintained for:		Year in Which Data Collection Began	Number of Years Records Are Maintained Length of service + 30 Yrs.
	Hourly Workers	Salaried Workers		
Date of hire	X	X	Date of hire	
Age at hire	X	X	" " "	" " "
Work history of individual before employment at your facility	X	X	" " "	" " "
Sex	X	X	" " "	" " "
Race				
Job titles	X	X	" " "	" " "
Start date for each job title	X	X	" " "	" " "
End date for each job title	X	X	" " "	" " "
Work area industrial hygiene monitoring data	X	X	1976	12
Personal employee monitoring data	X	X	1976	12
Employee medical history	X	X	Date of hire	Length of service
Employee smoking history	X	X	" " "	" " "
Accident history	X	X	" " "	" " "
Retirement date	X	X	" " "	" " "
Termination date	X	X	" " "	" " "
Vital status of retirees	X	X	Retirement date	N/A
Cause of death data	N/A	N/A	N/A	N/A

☐ Mark (X) this box if you attach a continuation sheet.

9.02 In accordance with the instructions, complete the following table for each activity in which you engage.

CBI

☐

a.	b.	c.	d.	e.
<u>Activity</u>	<u>Process Category</u>	<u>Yearly Quantity (kg)</u>	<u>Total Workers</u>	<u>Total Worker-Hours</u>
Manufacture of the listed substance	Enclosed	<u>NA</u>	<u>NA</u>	<u>NA</u>
	Controlled Release	<u>NA</u>	<u>NA</u>	<u>NA</u>
	Open	<u>NA</u>	<u>NA</u>	<u>NA</u>
On-site use as reactant	Enclosed	<u>NA</u>	<u>NA</u>	<u>NA</u>
	Controlled Release	<u>2,011,600</u>	<u>7</u>	<u>14,080</u>
	Open	<u>NA</u>	<u>NA</u>	<u>NA</u>
On-site use as nonreactant	Enclosed	<u>NA</u>	<u>NA</u>	<u>NA</u>
	Controlled Release	<u>NA</u>	<u>NA</u>	<u>NA</u>
	Open	<u>NA</u>	<u>NA</u>	<u>NA</u>
On-site preparation of products	Enclosed	<u>NA</u>	<u>NA</u>	<u>NA</u>
	Controlled Release	<u>NA</u>	<u>NA</u>	<u>NA</u>
	Open	<u>NA</u>	<u>NA</u>	<u>NA</u>

☐ Mark (X) this box if you attach a continuation sheet.

9.03 Provide a descriptive job title for each labor category at your facility that encompasses workers who may potentially come in contact with or be exposed to the listed substance.

CBI

☐

Labor Category

Descriptive Job Title

A

Foam Machine Superintendent

B

Supervisor

C

Operator

D

Cut-off Operator

E

Run Grabber Operator

F

Activator Man

G

Helper

H

I

J

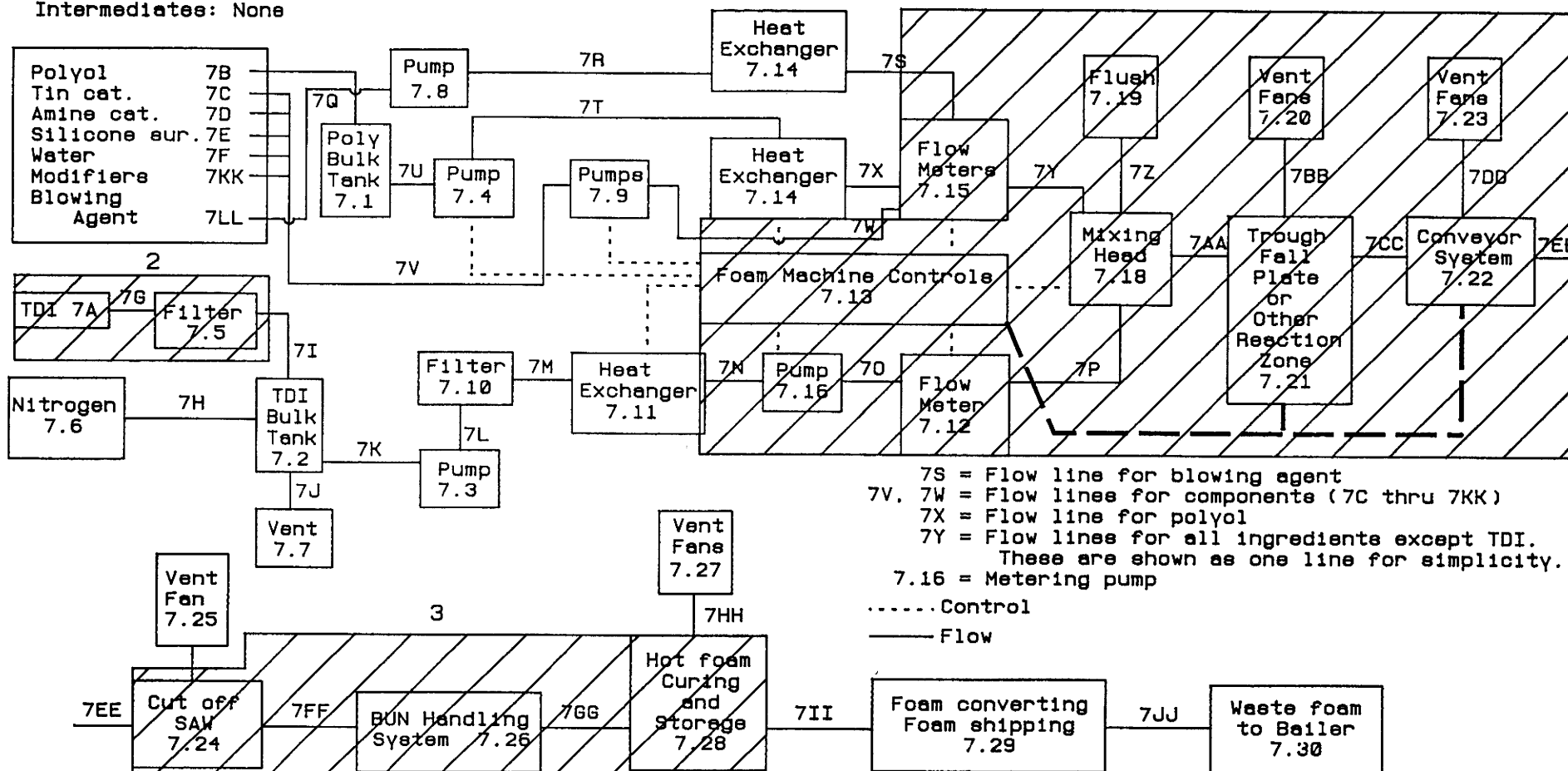
☐ Mark (X) this box if you attach a continuation sheet.

EDDYSTONE

9.04 Areas Employees are Potentially Exposed

Process Type: Flexible Slabstock Polyurethane Foam
Manufacturing Process

Intermediates: None



FOAM MODIFIERS

7KK-A Fire Retardant
7KK-B Pigments
7KK-C Germicide

NOTE: Every ingredient in the process has its own separate line to the mix head. Just prior to the mix head, there is a 3-way valve for re-cycle back to originating tank. These are not shown for the sake of simplicity.

BEST COPY AVAILABLE

9.05 Describe the various work area(s) shown in question 9.04 that encompass workers who may potentially come in contact with or be exposed to the listed substance. Add any additional areas not shown in the process block flow diagram in question 7.01 or 7.02. Photocopy this question and complete it separately for each process type.

CBI

☐ Process type POLYURETHANE FOAM-FLEXIBLE SLABSTOCK

Work Area ID

Description of Work Areas and Worker Activities

- | | |
|---|---|
| 1 | <u>Pumping systems and control section, chemicals mixed and</u>
<u>poured into reaction zone (7.21 and 7.22).</u> |
| 2 | <u>Bulk unloading section; activator man connects and disconnects</u>
<u>hoses at rail car for bulk unloading.</u> |
| 3 | <u>Fresh foam handling section; foam cut to length, conveyed to</u>
<u>storage and stacked using overhead storage equipment - crew</u>
<u>operates equipment.</u> |
| | <u> </u> |
| | <u> </u> |
| | <u> </u> |

☐ Mark (X) this box if you attach a continuation sheet.

9.06 Complete the following table for each work area identified in question 9.05, and for each labor category at your facility that encompasses workers who may potentially come in contact with or be exposed to the listed substance. Photocopy this question and complete it separately for each process type and work area.

CBI

☐ Process type Polyurethane Foam - Flexible Slatstock

Work area 1

Labor Category	Number of Workers Exposed	Mode of Exposure (e.g., direct skin contact)	Physical State of Listed Substance ¹	Average Length of Exposure Per Day ²	Number of Days per Year Exposed
A,B,C,D	8	Direct skin contact	OL	A	243
E,F,G	8	Inhalation	GU	D	243

¹Use the following codes to designate the physical state of the listed substance at the point of exposure:

GC = Gas (condensable at ambient temperature and pressure)
 GU = Gas (uncondensable at ambient temperature and pressure; includes fumes, vapors, etc.)
 SO = Solid

SY = Sludge or slurry
 AL = Aqueous liquid
 OL = Organic liquid
 IL = Immiscible liquid (specify phases, e.g., 90% water, 10% toluene)

²Use the following codes to designate average length of exposure per day:

A = 15 minutes or less
 B = Greater than 15 minutes, but not exceeding 1 hour
 C = Greater than one hour, but not exceeding 2 hours

D = Greater than 2 hours, but not exceeding 4 hours
 E = Greater than 4 hours, but not exceeding 8 hours
 F = Greater than 8 hours

☒ Mark (X) this box if you attach a continuation sheet.

9.06 Complete the following table for each work area identified in question 9.05, and for each labor category at your facility that encompasses workers who may potentially come in contact with or be exposed to the listed substance. Photocopy this question and complete it separately for each process type and work area.

☐ Process type Polyurethane Foam - Flexible Slabstock

Work area 2

Labor Category	Number of Workers Exposed	Mode of Exposure (e.g., direct skin contact)	Physical State of Listed Substance ¹	Average Length of Exposure Per Day ²	Number of Days per Year Exposed
A,B,F	1-3	Direct skin contact	OL	A	22
A,B,F	1-3	Inhalation	GU	D	22

¹Use the following codes to designate the physical state of the listed substance at the point of exposure:

GC = Gas (condensable at ambient temperature and pressure)
 GU = Gas (uncondensable at ambient temperature and pressure; includes fumes, vapors, etc.)
 SO = Solid

SY = Sludge or slurry
 AL = Aqueous liquid
 OL = Organic liquid
 IL = Immiscible liquid (specify phases, e.g., 90% water, 10% toluene)

²Use the following codes to designate average length of exposure per day:

A = 15 minutes or less
 B = Greater than 15 minutes, but not exceeding 1 hour
 C = Greater than one hour, but not exceeding 2 hours

D = Greater than 2 hours, but not exceeding 4 hours
 E = Greater than 4 hours, but not exceeding 8 hours
 F = Greater than 8 hours

☒ Mark (X) this box if you attach a continuation sheet.

9.06 Complete the following table for each work area identified in question 9.05, and for each labor category at your facility that encompasses workers who may potentially come in contact with or be exposed to the listed substance. Photocopy this question and complete it separately for each process type and work area.

CBI

☐ Process type Polyurethane Foam - Flexible Slabstock

Work area 3

Labor Category	Number of Workers Exposed	Mode of Exposure (e.g., direct skin contact)	Physical State of Listed Substance ¹	Average Length of Exposure Per Day ²	Number of Days per Year Exposed
A,B,D,F,G	5	Inhalation	GU	D	243

¹Use the following codes to designate the physical state of the listed substance at the point of exposure:

GC = Gas (condensable at ambient temperature and pressure)
 GU = Gas (uncondensable at ambient temperature and pressure; includes fumes, vapors, etc.)
 SO = Solid

SY = Sludge or slurry
 AL = Aqueous liquid
 OL = Organic liquid
 IL = Immiscible liquid (specify phases, e.g., 90% water, 10% toluene)

²Use the following codes to designate average length of exposure per day:

A = 15 minutes or less
 B = Greater than 15 minutes, but not exceeding 1 hour
 C = Greater than one hour, but not exceeding 2 hours

D = Greater than 2 hours, but not exceeding 4 hours
 E = Greater than 4 hours, but not exceeding 8 hours
 F = Greater than 8 hours

☐ Mark (X) this box if you attach a continuation sheet.

- 9.07. For each labor category represented in question 9.06, indicate the 8-hour Time Weighted Average (TWA) exposure levels and the 15-minute peak exposure levels. Photocopy this question and complete it separately for each process type and work area.

CBI

☐ Process type Polyurethane Foam - Flexible Slabstock

Work area 1-2-3

Labor Category	8-hour TWA Exposure Level (ppm, mg/m ³ , other-specify)	15-Minute Peak Exposure Level (ppm, mg/m ³ , other-specify)
A	.0022 ppm	.0084
B	.0019 ppm	.0016
C	.0032	.0012
D	.0017	.0035
E	.0050	.0037
F	.0022	.0051
G	.0081	.0137

Employees work in all three areas, exposure per area cannot be separated.

☐ Mark (X) this box if you attach a continuation sheet.

PART B WORK PLACE MONITORING PROGRAM

9.08 If you monitor worker exposure to the listed substance, complete the following table.

CBI

☐

<u>Sample/Test</u>	<u>Work Area ID</u>	<u>Testing Frequency (per year)</u>	<u>Number of Samples (per test)</u>	<u>Who Samples¹</u>	<u>Analyzed In-House (Y/N)</u>	<u>Number of Years Records Maintained</u>
Personal breathing zone	1-3	6	1	A	A	30
General work area (air)	1-3	6	4	A	A	30
Wipe samples	NA	NA	NA	NA	NA	NA
Adhesive patches	NA	NA	NA	NA	NA	NA
Blood samples	1-3	1	1	D	N	30
Urine samples	1-3	1	1	D	N	30
Respiratory samples	1-3	1	1	D	Y	30
Allergy tests	NA	NA	NA	NA	NA	NA
Other (specify)						
X-Ray	1-3	1	1	Hosp.	Y	30
Other (specify)						
Complete Physical	1-3	1	-	D	Y	30
Other (specify)						

¹Use the following codes to designate who takes the monitoring samples:

A = Plant industrial hygienist
 B = Insurance carrier
 C = OSHA consultant
 D = Other (specify) Plant Nurse

☐ Mark (X) this box if you attach a continuation sheet.

9.09 For each sample type identified in question 9.08, describe the type of sampling and analytical methodology used for each type of sample.

<input type="checkbox"/> Sample Type	Sampling and Analytical Methodology
Personnel Breathing Zone	Measured volume of air is pulled through a treated paper tape. A color develops in proportion to the TDI concentration; read on optical comparator.
Personnel Breathing Zone	Passive dosimeter; color develops and compared to a standard disk.
Area Sampling	Measured volume pulled through treated tape and level computed based on light transmission.

9.10 If you conduct personal and/or ambient air monitoring for the listed substance, specify the following information for each equipment type used.

CBI

<input type="checkbox"/> Equipment Type ¹	Detection Limit ²	Manufacturer	Averaging Time (hr)	Model Number
D	A	MDA Scientific	NK	4000
A	A	GMD Systems	NK	Sure Spot
H	A	GMD Systems	NK	920 Autostep

¹Use the following codes to designate personal air monitoring equipment types:

- A = Passive dosimeter
- B = Detector tube
- C = Charcoal filtration tube with pump
- D = Other (specify) Treated Tape

Use the following codes to designate ambient air monitoring equipment types:

- E = Stationary monitors located within work area
- F = Stationary monitors located within facility
- G = Stationary monitors located at plant boundary
- H = Mobile monitoring equipment (specify) _____
- I = Other (specify) _____

²Use the following codes to designate detection limit units:

- A = ppm
- B = Fibers/cubic centimeter (f/cc)
- C = Micrograms/cubic meter (μ/m^3)

☐ Mark (X) this box if you attach a continuation sheet.

- 9.11 If you conduct routine medical tests for monitoring the health effects of exposure to the listed substance, specify the type and frequency of the tests.

CBI

<input type="checkbox"/>	<u>Test Description</u>	<u>Frequency</u> (weekly, monthly, yearly, etc.)
	Physical Examination	Yearly
	Pulmonary Function	Yearly
	Chest X-Ray	Yearly

☐ Mark (X) this box if you attach a continuation sheet.

PART C ENGINEERING CONTROLS

9.12 Describe the engineering controls that you use to reduce or eliminate worker exposure to the listed substance. Photocopy this question and complete it separately for each process type and work area.

CBI

☐ Process type FLEXIBLE SLABSTOCK-POLYURETHANE FOAM

Work area 1,3

<u>Engineering Controls</u>	<u>Used (Y/N)</u>	<u>Year Installed</u>	<u>Upgraded (Y/N)</u>	<u>Year Upgraded</u>
Ventilation:				
Local exhaust	<u>Y</u>	<u>1980</u>	<u>Y</u>	<u>1982</u>
General dilution	<u>Y</u>	<u>1980</u>	<u>Y</u>	<u>1984, 1986</u>
Other (specify)				
<u>Cut-off Enclosure</u>	<u>Y</u>	<u>1988</u>	<u>N</u>	<u>NA</u>
Vessel emission controls	<u>NA</u>	<u>NA</u>	<u>NA</u>	<u>NA</u>
Mechanical loading or packaging equipment	<u>NA</u>	<u>NA</u>	<u>NA</u>	<u>NA</u>
Other (specify)				
<u>Improve TDJ Injection Nozzles</u>	<u>Y</u>	<u>1986</u>	<u>NA</u>	<u>NA</u>
Isolate from Adjacent Across	<u>Y</u>	<u>1989</u>	<u>NA</u>	<u>1989</u>

☐ Mark (X) this box if you attach a continuation sheet.

9.13 Describe all equipment or process modifications you have made within the 3 years prior to the reporting year that have resulted in a reduction of worker exposure to the listed substance. For each equipment or process modification described, state the percentage reduction in exposure that resulted. Photocopy this question and complete it separately for each process type and work area.

CBI

☐ Process type FLEXIBLE SLABSTOCK-POLYURETHANE FOAM

Work area 1,3

Equipment or Process Modification	Reduction in Worker Exposure Per Year (%)
Cut-off Area Enclosed	Not known

☐ Mark (X) this box if you attach a continuation sheet.

PART D PERSONAL PROTECTIVE AND SAFETY EQUIPMENT

- 9.14 Describe the personal protective and safety equipment that your workers wear or use in each work area in order to reduce or eliminate their exposure to the listed substance. Photocopy this question and complete it separately for each process type and work area.

CBI

☐ Process type FLEXIBLE SLABSTOCK-POLYURETHANE FOAM

Work area

<u>Equipment Types</u>	<u>Wear or Use (Y/N)</u>
Respirators	<u>Y</u>
Safety goggles/glasses	<u>Y</u>
Face shields	<u>N</u>
Coveralls	<u>N</u>
Bib aprons	<u>N</u>
Chemical-resistant gloves	<u>Y</u>
Other (specify)	
Safety Shoes	<u>Y</u>

☐ Mark (X) this box if you attach a continuation sheet.

- 9.15 If workers use respirators when working with the listed substance, specify for each process type, the work areas where the respirators are used, the type of respirators used, the average usage, whether or not the respirators were fit tested, and the type and frequency of the fit tests. Photocopy this question and complete it separately for each process type.

CBI

☐ Process type FLEXIBLE SLABSTOCK-POLYURETHANE FOAM

Work Area	Respirator Type	Average Usage ¹	Fit Tested (Y/N)	Type of Fit Test ²	Frequency of Fit Tests (per year)
1-3	Half-face Organic Vapor Cartridge	E	N	NA	NA

¹Use the following codes to designate average usage:

A = Daily
B = Weekly
C = Monthly
D = Once a year
E = Other (specify) As Required

²Use the following codes to designate the type of fit test:

QL = Qualitative
QT = Quantitative

☐ Mark (X) this box if you attach a continuation sheet.

PART E WORK PRACTICES

- 9.19 Describe all of the work practices and administrative controls used to reduce or eliminate worker exposure to the listed substance (e.g., restrict entrance only to authorized workers, mark areas with warning signs, insure worker detection and monitoring practices, provide worker training programs, etc.). Photocopy this question and complete it separately for each process type and work area.

CBI

☐

Process type FLEXIBLE SLABSTOCK-POLYURETHANE FOAM

Work area 1-2-3

Continuing worker training+ right-to-know

Protective equipment provided

Periodic exposure monitoring

Respirator protection available

- 9.20 Indicate (X) how often you perform each housekeeping task used to clean up routine leaks or spills of the listed substance. Photocopy this question and complete it separately for each process type and work area.

Process type FLEXIBLE SLABSTOCK-POLYURETHANE FOAM

Work area 1-2-3

Housekeeping Tasks	Less Than Once Per Day	1-2 Times Per Day	3-4 Times Per Day	More Than 4 Times Per Day
Sweeping	N	X	N	N
Vacuuming	N	X	N	N
Water flushing of floors	N	N	N	N
Other (specify)				

☐ Mark (X) this box if you attach a continuation sheet.

9.21 Do you have a written medical action plan for responding to routine or emergency exposure to the listed substance?

Routine exposure

Yes ~~Not required for~~ 1
Listed Substance

No 2

Emergency exposure

Yes ~~Not required for~~ 1

No ~~Listed Substance~~ 2

If yes, where are copies of the plan maintained?

Routine exposure: Not required for

Emergency exposure: Listed Substance

9.22 Do you have a written leak and spill cleanup plan that addresses the listed substance? Circle the appropriate response.

Yes (1)

No 2

If yes, where are copies of the plan maintained? Maintenance, Engineering, Foam Machine, Fire Department

Has this plan been coordinated with state or local government response organizations? Circle the appropriate response.

Yes (1)

No 2

9.23 Who is responsible for monitoring worker safety at your facility? Circle the appropriate response.

Plant safety specialist ~~Not required for~~ 1

Insurance carrier Listed Substance 2

OSHA consultant 3

Other (specify) _____ 4

☐ Mark (X) this box if you attach a continuation sheet.

SECTION 10 ENVIRONMENTAL RELEASE

General Instructions:

Complete Part E (questions 10.23-10.35) for each non-routine release involving the listed substance that occurred during the reporting year. Report on all releases that are equal to or greater than the listed substance's reportable quantity value, RQ, unless the release is federally permitted as defined in 42 U.S.C. 9601, or is specifically excluded under the definition of release as defined in 40 CFR 302.3(22). Reportable quantities are codified in 40 CFR Part 302. If the listed substance is not a hazardous substance under the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) and, thus, does not have an RQ, then report releases that exceed 2,270 kg. If such a substance however, is designated as a CERCLA hazardous substance, then report those releases that are equal to or greater than the RQ. The facility may have answered these questions or similar questions under the Agency's Accidental Release Information Program and may already have this information readily available. Assign a number to each release and use this number throughout this part to identify the release. Releases over more than a 24-hour period are not single releases, i.e., the release of a chemical substance equal to or greater than an RQ must be reported as a separate release for each 24-hour period the release exceeds the RQ.

For questions 10.25-10.35, answer the questions for each release identified in question 10.23. Photocopy these questions and complete them separately for each release.

PART A GENERAL INFORMATION

10.01 Where is your facility located? Circle all appropriate responses.

CBI

- ☐ Industrial area ①
- Urban area 2
- Residential area ③
- Agricultural area 4
- Rural area 5
- Adjacent to a park or a recreational area ⑥
- Within 1 mile of a navigable waterway 7
- Within 1 mile of a school, university, hospital, or nursing home facility ⑧
- Within 1 mile of a non-navigable waterway 9
- Other (specify) _____ 10

☐ Mark (X) this box if you attach a continuation sheet.

10.02 Specify the exact location of your facility (from central point where process unit is located) in terms of latitude and longitude or Universal Transverse Mercader (UTM) coordinates.

Latitude 31 ° 51 ' 19 "

Longitude 71 ° 12 ' 06 "

UTM coordinates Zone NA , Northing NA , Easting NA

10.03 If you monitor meteorological conditions in the vicinity of your facility, provide the following information.

Average annual precipitationNot required for listed substance inches/year

Predominant wind directionNot required for listed substance

10.04 Indicate the depth to groundwater below your facility.

Depth to groundwaterNot required for listed substance meters

10.05 For each on-site activity listed, indicate (Y/N/NA) all routine releases of the listed substance to the environment. (Refer to the instructions for a definition of Y, N, and NA.)

CBI

☐

On-Site Activity	Environmental Release		
	Air	Water	Land
Manufacturing	N/A	N/A	N/A
Importing	N/A	N/A	N/A
Processing	Y	N	N
Otherwise used	N/A	N/A	N/A
Product or residual storage	Y	N	N
Disposal	N/A	N/A	N/A
Transport	N/A	N/A	N/A

☐ Mark (X) this box if you attach a continuation sheet.

10.06 Provide the following information for the listed substance and specify the level of precision for each item. (Refer to the instructions for further explanation and an example.)

CBI

☐

Quantity discharged to the air	38.6	kg/yr ± 20 %
Quantity discharged in wastewaters	NA	kg/yr ± ____ %
Quantity managed as other waste in on-site treatment, storage, or disposal units	NA	kg/yr ± ____ %
Quantity managed as other waste in off-site treatment, storage, or disposal units	NA	kg/yr ± ____ %

☐ Mark (X) this box if you attach a continuation sheet.

- 10.08 Describe the control technologies used to minimize release of the listed substance for each process stream containing the listed substance as identified in your process block or residual treatment block flow diagram(s). Photocopy this question and complete it separately for each process type.

CBI

☐ Process type Flexible Slabstock Polyurethane Foam

<u>Stream ID Code</u>	<u>Control Technology</u>	<u>Percent Efficiency</u>
7J	None - Discharged to atmosphere	NA
7BB, 7DD, 7.25, 7HH	None - Discharged to atmosphere	NA
7.13, 7.18	Controls shut off flow of TDI first	100%
	in case of machine problems or at end	
	of run.	

☐ Mark (X) this box if you attach a continuation sheet.

PART B RELEASE TO AIR

- 10.09 Point Source Emissions -- Identify each emission point source containing the listed substance in terms of a Stream ID Code as identified in your process block or residual treatment block flow diagram(s), and provide a description of each point source. Do not include raw material and product storage vents, or fugitive emission sources (e.g., equipment leaks). Photocopy this question and complete it separately for each process type.

CBI

☐

Process type Flexible Slabstock Polyurethane Foam

Point Source
ID Code

Description of Emission Point Source

7J

TDI bulk tank vent

7BB

Reaction zone exhaust fans

7DD

Exhaust fans over conveyor section

7.25

Cut-off saw exhaust fan

7HH

Exhaust fans/loaf storage area

☐ Mark (X) this box if you attach a continuation sheet.

☐ Mark (X) this box if you attach a continuation sheet.

10.10 Emission Characteristics -- Characterize the emissions for each Point Source ID Code identified in question 10.09 by completing the following table.

CBI

☐

Point Source ID Code	Physical State ¹	Average Emissions (kg/day)	Frequency ² (days/yr)	Duration ³ (min/day)	Average Emission Factor ⁴	Maximum Emission Rate (kg/min)	Maximum Emission Rate Frequency (events/yr)	Maximum Emission Rate Duration (min/event)
7J	V	.028	22	240	1.9×10^{-7}	1.2×10^{-4}	22	240
7BR	V	.057	244	180	6.86×10^{-6}	2.4×10^{-4}	244	240
7DD	V	.024	244	180	2.88×10^{-6}	1×10^{-4}	244	240
7.25	V	.009	244	180	1.14×10^{-6}	3.75×10^{-5}	244	240
7HH	V	.005	244	180	5.7×10^{-7}	1.87×10^{-5}	244	240

¹Use the following codes to designate physical state at the point of release:

G = Gas; V = Vapor; P = Particulate; A = Aerosol; O = Other (specify) _____

²Frequency of emission at any level of emission

³Duration of emission at any level of emission

⁴Average Emission Factor -- Provide estimated (± 25 percent) emission factor (kg of emission per kg of production of listed substance)

10.11 Stack Parameters -- Identify the stack parameters for each Point Source ID Code identified in question 10.09 by completing the following table.

CBI

☐

Point Source ID Code	Stack Height(m)	Stack Inner Diameter (at outlet) (m)	Exhaust Temperature (°C)	Emission Exit Velocity (m/sec)	Building Height(m) ¹	Building Width(m) ²	Vent Type ³
7J	1 ⁽¹⁾	.15	25	5.1	7.3	NA	H
7BB	4.6	.9	25	4.7	7.3	2.4 ⁽²⁾	H
7DD	4.6	.9	25	9.2	7.3	2.4 ⁽³⁾	H
7.25	3.6	.9	25	9.4	7.3	3.6	H
7HH	3.6	.9	25	12.0	8.9	39.6	V
(1) Stack runs through wall and goes to ground level; exit approximately 1 M above ground.							
(2) Width of foaming tunnel which is enclosed.							
(3) Width of cut-off saw area which is enclosed.							

¹Height of attached or adjacent building

²Width of attached or adjacent building

³Use the following codes to designate vent type:

H = Horizontal

V = Vertical

☐ Mark (X) this box if you attach a continuation sheet.

- 10.12 If the listed substance is emitted in particulate form, indicate the particle size distribution for each Point Source ID Code identified in question 10.09. Photocopy this question and complete it separately for each emission point source.

CBI

☐

Point source ID code Not Applicable

Size Range (microns)

Mass Fraction (% \pm % precision)

< 1

Not Applicable

≥ 1 to < 10

Not Applicable

≥ 10 to < 30

Not Applicable

≥ 30 to < 50

Not Applicable

≥ 50 to < 100

Not Applicable

≥ 100 to < 500

Not Applicable

≥ 500

Not Applicable

Total = 100%

☐ Mark (X) this box if you attach a continuation sheet.

PART C FUGITIVE EMISSIONS

10.13 Equipment Leaks -- Complete the following table by providing the number of equipment types listed which are exposed to the listed substance and which are in service according to the specified weight percent of the listed substance passing through the component. Do this for each process type identified in your process block or residual treatment block flow diagram(s). Do not include equipment types that are not exposed to the listed substance. If this is a batch or intermittently operated process, give an overall percentage of time per year that the process type is exposed to the listed substance. Photocopy this question and complete it separately for each process type.

CBI

☐ Process type FLEXIBLE SLABSTOCK-POLYURETHANE FOAM

Percentage of time per year that the listed substance is exposed to this process type 100 %

Equipment Type	Number of Components in Service by Weight Percent of Listed Substance in Process Stream					Greater than 99%
	Less than 5%	5-10%	11-25%	26-75%	76-99%	
Pump seals ¹						
Packed	NA	NA	NA	NA	NA	NA
Mechanical	NA	NA	NA	NA	NA	NA
Double mechanical ²	NA	NA	NA	NA	NA	1
Compressor seals ¹	NA	NA	NA	NA	NA	NA
Flanges	NA	NA	NA	NA	NA	6
Valves						
Gas ³	NA	NA	NA	NA	NA	NA
Liquid	NA	NA	NA	NA	NA	
Pressure relief devices ⁴ (Gas or vapor only)	NA	NA	NA	NA	NA	4
Sample connections						
Gas	NA	NA	NA	NA	NA	NA
Liquid	NA	NA	NA	NA	NA	NA
Open-ended lines ⁵ (e.g., purge, vent)						
Gas	NA	NA	NA	NA	NA	NA
Liquid	NA	NA	NA	NA	NA	

¹List the number of pump and compressor seals, rather than the number of pumps or compressors

10.13 continued on next page

☐ Mark (X) this box if you attach a continuation sheet.

10.13 (continued)

² If double mechanical seals are operated with the barrier (B) fluid at a pressure greater than the pump stuffing box pressure and/or equipped with a sensor (S) that will detect failure of the seal system, the barrier fluid system, or both, indicate with a "B" and/or an "S", respectively

³Conditions existing in the valve during normal operation

⁴Report all pressure relief devices in service, including those equipped with control devices

⁵ Lines closed during normal operation that would be used during maintenance operations

10.14 Pressure Relief Devices with Controls -- Complete the following table for those pressure relief devices identified in 10.13 to indicate which pressure relief devices in service are controlled. If a pressure relief device is not controlled, enter "None" under column c.

[]

[illegible]

¹Refer to the table in question 10.13 and record the percent range given under the heading entitled "Number of Components in Service by Weight Percent of Listed Substance" (e.g., <5%, 5-10%, 11-25%, etc.)

²The EPA assigns a control efficiency of 100 percent for equipment leaks controlled with rupture discs under normal operating conditions. The EPA assigns a control efficiency of 98 percent for emissions routed to a flare under normal operating conditions

☐ Mark (X) this box if you attach a continuation sheet.

10.15 Equipment Leak Detection -- If a formal leak detection and repair program is in place, complete the following table regarding those leak detection and repair procedures. Photocopy this question and complete it separately for each process type.

CBI

☐ Process type Not Applicable

<u>Equipment Type</u>	<u>Leak Detection</u>	<u>Detection Device¹</u>	<u>Frequency of Leak Detection (per year)</u>	<u>Repairs Initiated (days after detection)</u>	<u>Repairs Completed (days after initiated)</u>
	<u>Concentration (ppm or mg/m³) Measured at _____ Inches from Source</u>				
Pump seals					
Packed					
Mechanical					
Double mechanical					
Compressor seals					
Flanges					
Valves					
Gas					
Liquid					
Pressure relief devices (gas or vapor only)					
Sample connections					
Gas					
Liquid					
Open-ended lines					
Gas					
Liquid					

¹Use the following codes to designate detection device:

POVA = Portable organic vapor analyzer

FPM = Fixed point monitoring

0 = Other (specify) _____

☐ Mark (X) this box if you attach a continuation sheet.

☐ Mark (X) this box if you attach a continuation sheet.

10.16 Raw Material, Intermediate and Product Storage Emissions - - Complete the following table by providing the information on each liquid raw material, intermediate, and product storage vessel containing the listed substance as identified in your process block or residual treatment block flow diagram(s).

CBI

☐

Vessel Type ¹	Floating Roof Seals ²	Composition of Stored Materials ³	Throughput (liters per year)	Vessel Filling Rate (gpm)	Vessel Filling Duration (min)	Vessel Inner Diameter (m)	Vessel Height (m)	Operating Vessel Volume (l)	Vessel Emission Controls ⁴	Design Flow Rate ⁵	Vent Diameter (cm)	Control Efficiency (%)	Basis for Estimate ⁶
H	NA	100%	1,649,000	61.6	270	3.6	NA	121,000	None	NA	15.2	NA	NA

*Horizontal Tank

¹Use the following codes to designate vessel type:

F = Fixed roof
 CIF = Contact internal floating roof
 NCIF = Noncontact internal floating roof
 EFR = External floating roof
 P = Pressure vessel (indicate pressure rating)
 H = Horizontal
 U = Underground

²Use the following codes to designate floating roof seals:

MS1 = Mechanical shoe, primary
 MS2 = Shoe-mounted secondary
 MS2R = Rim-mounted, secondary
 LM1 = Liquid-mounted resilient filled seal, primary
 LM2 = Rim-mounted shield
 LMW = Weather shield
 VM1 = Vapor mounted resilient filled seal, primary
 VM2 = Rim-mounted secondary
 VMW = Weather shield

³Indicate weight percent of the listed substance. Include the total volatile organic content in parenthesis

⁴Other than floating roofs

⁵Gas/vapor flow rate the emission control device was designed to handle (specify flow rate units)

⁶Use the following codes to designate basis for estimate of control efficiency:

C = Calculations
 S = Sampling

PART E NON-ROUTINE RELEASES

10.23 Indicate the date and time when the release occurred and when the release ceased or was stopped. If there were more than six releases, attach a continuation sheet and list all releases.

<u>Release</u>	<u>Date Started</u>	<u>Time (am/pm)</u>	<u>Date Stopped</u>	<u>Time (am/pm)</u>
1	No non-routine releases			
2				
3				
4				
5				
6				

10.24 Specify the weather conditions at the time of each release.

<u>Release</u>	<u>Wind Speed (km/hr)</u>	<u>Wind Direction</u>	<u>Humidity (%)</u>	<u>Temperature (°C)</u>	<u>Precipitation (Y/N)</u>
1					
2	Not required for listed substance				
3					
4					
5					
6					

☐ Mark (X) this box if you attach a continuation sheet.

APPENDIX I: List of Continuation Sheets

Attach continuation sheets for sections of this form and optional information after this page. In column 1, clearly identify the continuation sheet by listing the question number to which it relates. In column 2, enter the inclusive page numbers of the continuation sheet for each question number.

[illegible]

☐ Mark (X) this box if you attach a continuation sheet.